

# Spinal Cord Injury (SCI) Ontario, Accessibility Plan

## April 2017 – March 2022

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### **About Spinal Cord Injury Ontario**

*Our Vision:* People with spinal cord injuries living the life they choose in a fully inclusive Ontario.

*Our Mission:* We deliver and champion excellence in service, support and advocacy for people with spinal cord injuries.

### **Background to Plan**

In June 2005, the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA), with the goal to make Ontario accessible to people with disabilities and remove all barriers by 2025.

In 2008, the Accessibility Standard for Customer Service became law. SCI Ontario's commitment to ensure accessible customer service is reflected in SCI Ontario's Customer Service Standard Handbook which was released in January 2012.

In 2011, the Integrated Accessibility Standards Regulation (IASR) became law. This regulation includes accessibility standards for information and communications, employment and transportation and the built environment. Each of these standards have specific requirements and staggered compliance deadlines.

One of the requirements of the Integrated Accessibility Standards Regulation (IASR) is the development of a multi-year accessibility plan to identify, address and prevent barriers for individuals with disabilities from using the services, programs and/or working at SCI Ontario.

## Statement of SCI Ontario's Commitment

SCI Ontario is committed to provide its services in a way that respects the dignity, independence, integration, inclusion and equal opportunity of people with disabilities. SCI Ontario is committed to meeting all needs in a timely manner and to identifying, removing, and preventing barriers that reduce the ability of individuals with disabilities to full access; increasing awareness of accessibility initiatives; and promoting legislative compliance. SCI Ontario will provide accessibility and accommodation for individuals with disabilities through the Accessibility for Ontarians with Disabilities Act (AODA)'s Customer Service Standard, Integrated Accessibility Standard Regulation and all other standards as they are developed and that are in accordance with the requirements of the Ontario Human Rights Code.

SCI Ontario's Accessibility Plan is divided into two sections. **Section 1** of the plan addresses requirements under the AODA legislation. **Section 2** identifies accessibility barriers and solutions based on input from clients, employees and other stakeholders via annual surveys and other mechanisms made available for input. .

SCI Ontario's Accessibility Plan addresses accessibility issues at our service locations, providing our services in the community and the community at large as it impacts our clients. Our multi-year accessibility plan also outlines the policies, procedures and actions that SCI Ontario will put in place to improve opportunities for people with disabilities.

### Types of Accessibility Barriers

SCI Ontario's Accessibility Plan (section two) addresses eight categories of barriers which include and are defined as follows;

Architectural - any physical design or structural factor that makes accessibility difficult. Examples could include; lack of ramps or ramps that are not accessible, lack of accessible parking, narrow doorways/elevators, or Braille for individuals who have a visual disability.

Environmental – a characteristic of a work or service setting that compromises or impedes the ability to provide service or receive the benefits of service delivery. Examples of this could include; lack of privacy which compromises confidentiality, a service location where staff or clients are exposed to fragrances, excessive noise, or harsh lighting.

Attitudinal - a preconceived attitude (usually negative) that people have towards individuals with disabilities. This may include such things as; using disrespectful language, promoting dependence vs. independence or not seeking input of individuals with disabilities.

Financial - anything that may mean a service is restricted because of lack of sufficient financial resources. This type of barrier could be systemic issues such as insufficient funds for a particular program that result in a wait list, or lack of funded transportation to get to a service appointment. Financial barriers may exist at an organizational level, or may be specific to funds possessed by persons served.

Employment - systems, policies and procedures that place employees with disabilities at a disadvantage in obtaining, maintaining or advancing in their job. Examples could include; lack of access to job accommodation ( e.g. adaptive technology, attendant services in the work place, flexible work hours). This may also include barriers to recruitment and/or career advancements for individuals with a disability.

Communication - factors that prevent SCI Ontario information from being accessible and understandable to all clients, employees, volunteers, stakeholders and public. Examples may include lack of accessible formats (e.g. large print), lack of access to interpreters, lack of non-verbal communication tools, and limitations in website accessibility, a user unfriendly web interface or not using plain language in communications etc.

Transportation - factors that contribute to an individual's inability to access a service location or being unable to fully participate in services as a direct result of non-accessible transportation.

Community Integration – could include any barrier to an individual with a disability that prevents access to full participation in the community of their choice. Examples could include barriers to employment, schooling, volunteering and/or leisure activities which they have expressed as a goal in their service with SCI Ontario.

### **Identification of Barriers**

SCI Ontario seeks input from clients and employees via targeted questions on annual satisfaction surveys and has a mechanism for ongoing input from the public and other stakeholders through an email address: [accessibility@sciontario.org](mailto:accessibility@sciontario.org), published on the website. The data collected from all of these sources is analyzed and considered in the annual review of the SCI Ontario Accessibility Plan and updated as required.

### **Review of Accessibility Plan**

SCI Ontario's Accessibility Plan will be reviewed annually and updated as required based on new information, with updates occurring no less than every 5 years. The current updated plan covers a 5 year period, to align with our strategic plan.

### **Communication of Accessibility Plan**

SCI Ontario's Accessibility Plan will be posted on the organization's website and staff intranet. Alternative formats will be made available upon request. If you have any questions about the plan, please contact us by email at [accessibility@sciontario.org](mailto:accessibility@sciontario.org); by phone via 1-877-422-1112, extension 233 or by mail to Accessibility – SCI Ontario, 520 Sutherland Drive, Toronto ON M4G 3V9.

## SECTION 1 - AODA Legislative Requirements

AODA Requirement & Legislative Compliance Deadline	Action/Initiative	Responsibility	Target Date/Status	Follow up Recommendation (as of 2016)	2017 Update
Customer Service Policies, Procedures and Training of employees, January 2013	Develop a SCI Ontario, Customer Service Policy and Procedure Handbook	Senior Manager, Human Resources	Completed – December 2012	Incorporate handbook into SCI Ontario Standard Policy and Procedure Formats	Updated to incorporate new elements eff. July 1, 2016- 2017
	Train all staff in Customer Service Guidelines as per Handbook and provide training on-going for new employees. All new employees will complete the accessibility training as part of their onboarding process within the first 90 days of their start date.	Senior Manager, Human Resources	Completed- December 2012	Developed E-Learning training module on Customer Service for all staff. Information will be included on the SCI Ontario intranet.	E-learning module – complete. Part of all new hires orientations now, including Volunteers.
	Implement a feedback mechanism on accessibility for customers and make this information available to public. Inquiries may be made by website, telephone or in writing.	Senior Manager, Human Resources	Completed - December 2012	Continually evaluate feedback.	The email address <a href="mailto:accessibility@sciontario.org">accessibility@sciontario.org</a> remains available for inquiries.
	Report Compliance to Ministry	Senior Manager, Human Resources	Completed - January 2013	On-going compliance reporting will be completed as required.	Reports filed as often as required. Next report to be filed by December 31, 2017.
Emergency Response Information , January 2013	Emergency Response Plan (ERP) and Manual was developed and tools to obtain accommodation requirements of employees with disabilities in the event of an emergency	Senior Manager, Human Resources	Completed- January 2013 and process is in place to collect information from new employees during orientation	Emergency Response Plan is currently under review to meet accreditation standards	Emergency Response Policies updated in July 2015 and rolled out to the organization. Mandatory training occurs on an annual basis. Information from employees is updated on an annual basis.

<b>AODA Requirement &amp; Legislative Compliance Deadline</b>	<b>Action/Initiative</b>	<b>Responsibility</b>	<b>Target Date/Status</b>	<b>Follow up Recommendation (as of 2016)</b>	<b>2017 Update</b>
Accessibility Policy by January 2014	Establish an Accessibility Policy that will govern SCI Ontario's overall approach to meeting the Integrated Accessibility Standards Regulation (IASR) standards, under AODA requirements.	Senior Manager, Human Resources	Completed- January 2014	Review annually and update as applicable.	Reviewed July 2017.
Accessibility Plan by January 2014	Develop a SCI Ontario multi-year Accessibility Plan and post on the website	Senior Manager, Human Resources	Completed- January 2014	Review and update, as applicable; minimum every 5 years.	Reviewed and updated November 2017. Posted on the Intranet and Website.
AODA, IASR Training by January 2015	Provide training to all staff and volunteers on the rights and obligations under the IASR and the Human Rights Code (as it pertains to people with disabilities). Maintain training records.	Senior Manager, Human Resources	Completed - January 2015	Evaluate training once completed and incorporate appropriate feedback.	Training continues to be part of new hire orientations.
Accessible Formats and Communication Supports made available upon request by Jan. 2016	Print Marketing and communication materials are in PDF format and can be made into accessible PDFs on request.	, Marketing & Communications	Completed – at present; requests met on demand	None at this time.	Made available, upon request. Videos are captioned, internally and externally.
Accessible Website  Conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, at Level A by January 2014 and level AA by 2021	According to the Website Accessibility Evaluation Tool (WAVE), SCI Ontario's website has no errors. SCI Ontario will continue to upgrade its intranet and websites and review their content to ensure that they meet accessibility standards working with programmers, designers and website accessibility experts.	Marketing & Communications	Level A – January 2014	The work is ongoing as sites are redesigned and new content is added.	SCI Ontario has partnered with Durham College for re-design; as required, enhancements considered and made continually to meet/exceed guidelines.

<b>AODA Requirement &amp; Legislative Compliance Deadline</b>	<b>Action/Initiative</b>	<b>Responsibility</b>	<b>Target Date/Status</b>	<b>Follow up Recommendation (as of 2016)</b>	<b>2017 Update</b>
<p>Accessibility in Human Resources (HR) Practices- (Employment Standards of IASR) by January 2016</p> <p>Recruitment Process</p>	<p>All Job postings have equal opportunity statement encouraging individuals with disabilities to apply.</p> <p>At the time of scheduling interviews, candidates are asked if they require accommodations for the interview process and suitable arrangements are made.</p> <p>Accommodation needs are identified at time of or just following offer of employment and suitable arrangements are made.</p>	Senior Manager, Human Resources	Completed- has been in practice for several years	<p>Review and update HR, Equal Opportunity and Recruitment Policies to reflect AODA requirements and existing practices.</p> <p>Statement in employment offer letters continues to inform of policies and practices.</p> <p>Statement in job postings continues that reasonable and appropriate accommodation will be provided during the recruitment process upon request.</p>	<p>Reviewed October 2017</p> <p>Ongoing</p>
Accessible formats and communication supports for employees by Jan. 2016	This item has been addressed in the accommodation policy as noted below.	Senior Manager, Human Resources	Completed- June 2013	Implement improvements based on feedback in employee survey as noted below in Communications section of Accessibility Plan.	Addressed, as required.
Accommodation process and plan for Employees by January 2016	Development of accommodation policy/procedure and plan for employees with disabilities Ref # HR 3-017	Senior Manager, Human Resources	Completed- June 2013	Log accommodation requests to identify trends. Provide further education to managers and employees on our accommodation process and employee rights, as required.	Log updated continually by HR team.
Return to work process by January 2016	Review and update existing HR policy on Return to Work, Modified Duties, Occupational and Non-occupational Disability, Ref # HR 3-011.	Senior Manager, Human Resources	Released March 2014	Release and train staff on new policy	Policy updated and re-released August 2016. Reviewed again November 2017.

<b>AODA Requirement &amp; Legislative Compliance Deadline</b>	<b>Action/Initiative</b>	<b>Responsibility</b>	<b>Target Date/Status</b>	<b>Follow up Recommendation (as of 2016)</b>	<b>2017 Update</b>
Performance Management Process by January 2016	Amend policy on Performance Management for all employees, which will also address AODA requirement to take into account employee accommodation needs in this process.	Senior Manager, Human Resources	Released November 2015	Release and train staff on new policy.	Reviewed annually and amended, as required.
Career Development, Advancement and Redeployment Process by January 2016	Address Career Development, Advancement and Redeployment AODA requirements within update of HR Policy, Recruitment from Within Ref #HR 1-002	Senior Manager, Human Resources	Released June 2014	Release and train staff on new policy.	Reviewed annually and amended, as required.

## Section 2-BARRIERS as identified in Accessibility Survey August 2017

<b>Architectural Barriers</b>					
<b>Barrier</b>	<b>Location if applicable</b>	<b>Strategies to Address</b>	<b>Timeline</b>	<b>Lead</b>	<b>2017 Update</b>
Lack of signs in braille	Provincial Office, Lyndhurst Centre, UHN	Consult with UHN to co-ordinate additional signage in braille.	March 2018	Executive Assistant to liaise with UHN	Signage consideration has been initiated
Mobility obstruction ((power chairs); clutter, narrow doorways	Provincial Office	Improve space; remove file cabinets in hallways; reception area has been de-cluttered; JHSC via monthly workplace inspections	Completed November 2017	Executive Assistant/JHSC	Completed; re-check April 2018; JHSC quarterly meeting review
Inaccessible bathroom	Finch office	Met with landlord - landlord declined putting in automatic door operator due to expense. Assistance can be provided by office team, if required	April 2018	Senior Manager, Attendant Services	The Finch office team is moving to the Sutherland location in early 2018, which is fully accessible
Clutter in underground parking at Lyndhurst	Provincial Office, Lyndhurst Centre	Provide reminder to Lyndhurst maintenance staff of potential hazard re: storing of hoses	Ongoing	Executive Assistant	Signage provided

<b>Environmental Barriers</b>					
<b>Barrier</b>	<b>Location if applicable</b>	<b>Strategies to Address</b>	<b>Timeline</b>	<b>Lead</b>	<b>2017 Update</b>
Lack of Privacy/Confidentiality	Provincial Office; Hamilton	Continuously review office space configuration at Provincial Office to address any barriers.	April 2018	CEO Team/HR/ Executive Assistant Director, Client Services	Additional meeting room has been identified; several positions have been designated home office positions and teleworking is available to staff. HHS has meetings rooms available; these need to be booked in advance
Heating/Cooling issues	Provincial Office	Continue to work with Lyndhurst Maintenance	Ongoing	Executive Assistant	Lyndhurst has put in a new cooling system.



					Adjustments are made as necessary within the offices
Lighting	Finch office	Request landlord for trade outs as may be requested	April 2018	Executive Assistant/HR	Finch office team moving to provincial office
Fragrance	All	Remind of Fragrance Free Workplace Policy – staff and clients	December 2017	Management/HR/M & C	Advise clients, staff, and volunteers, potential applicants, new hires; repost fragrance-free poster and refresh website notice

<b>Communication Barriers</b>					
<b>Barrier</b>	<b>Location</b>	<b>Strategies to Address</b>	<b>Timeline</b>	<b>Lead</b>	<b>2017 Update</b>
Materials in languages other than English	Cross Organizational	Evaluate need for materials in other languages- which languages are most commonly required- assess feasibility.	April 2018	Director, Client Services Senior Manager, Marketing & Communications	Plan to provide French language recording on main line(s).
Interpreter Services for clients	Cross Organizational	Allocate funding in regional services budgets for essential interpreter services and process for staff to access when required.	Ongoing	Director,, Client Services	Funds in Management budget for interpreter services for client service across the province
Alternative formats (ie. Large print , E-books )	Cross Organizational	Evaluate materials that are currently available in printed material and those which would be suitable for converting into alternative formats. Consider if LASCI can be made amiable electronically.	2018	New Director, Marketing, Communications and Membership	Continuous review and upon request.

<b>Barrier</b>	<b>Location if applicable</b>	<b>Strategies to Address</b>	<b>Timeline</b>	<b>Lead</b>	<b>2017 Update</b>
Consider accessibility needs of staff when choosing communication mechanism for meetings or important communications (i.e. use of teleconferences)	Cross Organizational	Offer alternative method of participation for staff that require accommodation in advance of meetings.	Ongoing	All Managers	Started to use Skype for meetings and interviews. CART Services – Transcript of teleconference meetings for people with hearing impairments in real time. (Parascope, Twitter live feed, Spacebook live, Adobe Connect) RFP – telephone system; voice-activated software

<b>Employment Barriers</b>					
<b>Barrier</b>	<b>Location</b>	<b>Strategies to Address</b>	<b>Timeline</b>	<b>Lead</b>	<b>2017 Update</b>
Lack of accommodation (Workplace Support Services not available in all regions)	Regional offices	Provide workplace support, as identified by staff. Highlight accommodation policy; managers have received training.	Ongoing	HR Generalist	HR ensures to support accommodations, as identified.
Stressful commute	Provincial Office	Teleworking policy developed October 2017 with extensive cross-organization consultation	Available and ongoing	SCI Ontario Management	Teleworking supported as deemed reasonable and as per the policy.
Barriers to advancement	Cross-organization	Special Project availability; all vacant/new positions posted internally	Ongoing, as available	Human Resources with Management Team	Special Projects with several staff seconded with an increase to FTE.

<b>Transportation Barriers</b>					
<b>Barrier</b>	<b>Location</b>	<b>Strategies to Address Barrier</b>	<b>Timeline</b>	<b>Lead</b>	<b>2017 Update</b>
Access to offices off public transit line are challenging for clients who take public transportation, including cost	Provincial Office, Hamilton, SSM, Thunder Bay	Educate staff to make accommodations for alternative meeting locations to meet client needs	Ongoing	Senior Manager, Public Policy & Government Relations  Director, Client Services	Employees aware of this option.
<b>Financial Barriers</b>					
<b>Barrier</b>	<b>Location</b>	<b>Strategies to Address Barrier</b>	<b>Timeline</b>	<b>Lead</b>	<b>2017 Update</b>
Insufficient funds for program (waitlist) - Toronto	Provincial Office was primary mention	Client Services Management to assess need and identify strategy and funding options.	Ongoing	Client Services Management Team	Resolved. TTC tokens and parking is covered by organization. Development of workshops into E-learning modules continues to also increase accessibility.
Lack of funded transportation to attend a service appointment	Hamilton, Wellington, Waterloo, Sault Ste. Marie	One of the priorities of the Public Policy Program	Ongoing	Senior Manager, Public Policy and Government Relations	Continued efforts will be made in this area
Lack of funds for equipment	Outreach - Finch	Ensure safety of clients and Attendants is foremost.	Ongoing	Senior Manager, Attendant Services	JHSC meeting agenda item.
Transportation support for clients	Provincial Office	Consider viability of a fair and consistent process for providing TTC tokens	March 2018	Client Services Managers	Address budgetary availability