



## **Accessibility Policy**

Last Updated: August 28, 2022

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### **1. PURPOSE**

The purpose of this policy is to outline the Digital Research Alliance of Canada's ("the Alliance") commitment to providing an environment that is inclusive and that is free of barriers based on age, race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy and breastfeeding), gender identity, gender expression, sexual orientation, record of offences, marital status, family status, and disability, through meeting its obligation to provide employees with reasonable accommodations, whether temporary or permanent in nature.

### **2. SCOPE**

The provisions of this policy apply to all Alliance employees, contractors, members, visitors, volunteers, applicants, consultants, interns, co-op students, clients, and any other individual in an employment-like relationship with the Alliance. It also applies to any other party that provides services, and/or facilities on behalf of the Alliance.

This Policy applies at all stages and to all aspects of the employment and/or working relationship, including but not limited to, recruitment and selection, promotions and transfers, and conditions of work and/or agreement. In the event that any provision of this policy is found to be inconsistent with the provisions of an agreement, the agreement will prevail, unless the Policy provision is required by law, in which case the Policy provision will prevail.

### **3. POLICY**

#### **3.1 Principles**

The Alliance demonstrates the concept of accessibility by fostering an environment that treats persons with disabilities with respect, and follows these guiding principles:

- **Dignity:** providing service in a way that ensures self-respect and the respect of others by maintaining the Independence and free participation of persons with disabilities.
- **Independence:** ability to engage with the environment on their own, without unnecessary help or interference from others.
- **Integration:** providing service in a way that allows the person to fully benefit from the same services, in the same place, and in the same or similar ways as other persons.
- **Equal Opportunity:** having the same chances, options, and benefits to achieve the same results as others. In the case of services, it means that the individual has the same opportunity as others to benefit from the services provided, without needing significantly more effort to access or obtain services, nor accept lesser quality.



The Alliance is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. The Alliance believes in integration and is committed to meeting the needs of people with disabilities in a timely manner, by taking steps to identify, eliminate, minimize, or prevent barriers to accessibility. The Alliance recognizes that barriers include physical, environmental, attitudinal, interpersonal, communication, and technological components that may prevent the full participation of and equal opportunity for persons with disabilities in the Alliance community.

### **3.2 Legal Framework**

The Policy will be construed in accordance with applicable law, in particular, the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 (AODA) and its regulations. Other applicable laws include:

- *Ontario Human Rights Code, R.S.O 1990, c. H.19*
- *Building Code Act, 1992, S.O. 1992, c. 23*
- *Workplace Safety and Insurance Act, 1997, S.O. 1997, c.16*
- *Health Protection and Promotion Act, R.S.O. 1990, c. H.7*
- *Employment Standards Act, 2000, S.O. 2000, c. 4:1*
- *Occupational Health and Safety Act, R.S.O. 1990, c. O.1.*
- *Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F.31*
- *Canadian Human Rights Act*

If any of these legal provisions are modified, abrogated, superseded, or added to, the Policy will be interpreted in accordance with the new legal framework.

### **3.3 Confidentiality and Privacy**

The Alliance recognizes that the privacy of the individuals contemplated under the scope in this policy is of the utmost importance. Confidentiality is to be ensured and information is to be managed as prescribed under the legislation.

### **3.4 Information and Communication**

The Alliance will communicate with people with disabilities in ways that consider their disability. When asked, information about the Alliance and its services, including public safety information, will be provided in accessible formats or with communication supports.

The Alliance will meet Web Content Accessibility Guidelines (WCAG) 2.0 Level AA for all Public Websites, in accordance with AODA. The Alliance recognizes that certain public web content is considered special collections archival materials, and/or educational material that may be exempt from meeting WCAG 2.0 guidelines. In such instances, the Alliance will provide the information in an accessible or Conversion Ready format, upon request.



### **3.5 Telephone Services**

The Alliance is committed to providing fully accessible telephone service to individuals. We will train all staff to communicate with individuals over the telephone in clear and plain language and to speak clearly and slowly.

We will offer to communicate with individuals by e-mail or regular mail if telephone communication is not suitable for their communication needs or is not available.

### **3.6 Temporary Service Disruption**

The Alliance will disseminate information regarding a temporary disruption in services including building entrances, elevators, washroom facilities, and access to technology. The Alliance will post notices of estimated timelines, reasons for the disruption, alternate access, and will make every effort to ensure the Alliance and the public is notified in advance if and when feasible.

### **3.7 Assistive Devices**

The Alliance makes every effort to ensure that persons with disabilities can use their own personal assistive devices to access services. If the Alliance is unable to accommodate the use of personal assistive devices, the Alliance will work with the person to provide a mutually-agreed upon, reasonable solution.

### **3.8 Support Persons and Service Animals**

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that staff are properly trained in how to interact with people with disabilities who are accompanied by a service animal. We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the Company's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. We will also ensure that staff are properly trained in how to interact with people with disabilities who are accompanied by a support person.

### **3.9 Employment**

Employees, potential hires, and the public are notified that accommodations can be made during the recruitment, hiring process and throughout the full employment life cycle. The Alliance will put in place a process to develop individual Accommodation Plans for employees to support little to no disruption to their employment. Where needed, the Alliance will also provide customized emergency information to help an employee with a disability during an emergency. The Alliance's performance management, career development, and redeployment processes will consider the accessibility needs of all employees.



The Alliance is committed to equitable employment and encourages applications from all qualified candidates. The Alliance will work with its employee groups to determine the need for additional policies, standards and/or guidelines that address accessibility and accommodation within the workplace.

### **3.10 Return to Work Process**

The Alliance must have in place a documented return to work process for employees returning to work following an illness or injury where disability-related accommodations are required. This requirement is met through return-to-work processes supported by Occupational Health and Safety program consistent with the return-to-work protocols.

## **4. PROCEDURES**

### **4.1 Training**

The Alliance will provide accessibility training to all individuals in an employment-like relationship with the Alliance, and any individual who provides services, or facilities on behalf of the organization. The Alliance will provide ongoing training to all individuals in an employment-like relationship and individuals who provide services, or facilities on behalf of the organization on any changes to this policy in a timely manner. The Alliance will provide additional training to individuals as it relates to their specific role when required.

We are committed to training all individuals in accessible customer service, other Ontario's accessibility standards, and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, the Alliance will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide services or facilities on behalf of the organization
- c) Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the requirements of the Customer Service Standards,
- our policies related to the Customer Service Standards,
- how to interact and communicate with people with various types of disabilities,
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person,
- how to use the equipment or devices available on-site or otherwise that may help with providing services, or facilities to people with disabilities, and
- what to do if a person with a disability is having difficulty in accessing our organization's services or facilities.



We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

#### **4.2 Emergency Information and Procedure**

The Alliance is committed to providing individuals with publicly available emergency information in an accessible way upon request.

#### **4.3 Feedback and Complaint Process**

Feedback regarding the way the Company provides services to people with disabilities can be made by e-mail or verbally. All feedback, including complaints, will be directed to Human Resources at [hr-rh@alliancecan.ca](mailto:hr-rh@alliancecan.ca). Individuals can expect to hear back within 14 business days. Accessible formats and communication supports are available on request.

#### **4.4 Notice of Availability of Documents**

This Policy will be maintained by the Human Resources Department and available on the Alliance's [website](#). The Policy must be provided to individuals, upon request, in the appropriate format or with communication supports.

#### **4.5 Modifications to this or other Alliance Policies**

The Alliance is committed to developing customer service policies that respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities. Therefore, no changes will be made to this Policy before considering the impact on people with disabilities.

#### **4.6 Compliance**

This Policy is under the jurisdiction of Human Resources. The interpretation and application of this Policy is the responsibility of Human Resources. This Policy will be reviewed once every 5 years.

### **5. RESPONSIBILITIES**

Accommodation is a shared responsibility between employees and the Alliance, as the employer.

The Alliance is responsible for:

- fostering an inclusive environment by treating all individuals with respect and dignity;
- addressing barriers that prevent people from accessing, or being included in, the workplace;
- minimizing the need for individual accommodation by reviewing policies and practices to ensure that they are not discriminatory;
- ensuring that all individuals are advised of their right to be accommodated;



- dealing with requests for accommodation in a timely, confidential and sensitive manner;
- involving individuals requiring accommodation in the development of reasonable accommodations;
- informing individuals requiring accommodation what information they need to provide to have their accommodation requests considered;
- initiating a discussion about accommodation when the Alliance has reason to inquire whether an individual may have need for accommodation; and
- making and implementing offers of reasonable accommodations and properly documenting such accommodations, as necessary.

Employees, job applicants, and all individuals in an employment-like relationship with the Alliance are responsible for:

- making their accommodation needs known, to the extent they are able;
- helping to identify potential accommodation options;
- providing documentation in support of their request for accommodation, including information about relevant restrictions or limitations; and
- accepting an offer of reasonable accommodation that meets their needs, even if it is not their preferred accommodation option.

**Definitions apply as outlined in the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 (AODA) and Section 10 of the Canadian Human Rights Act.**