
Introduction:

Fedcap Canada is committed to ensuring equal access and participation for people with disabilities. We believe in the principles of equal opportunity and integration, and that people with disabilities should be treated in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner, and to be proactive by considering accessibility in all planning and decision-making processes. We will work continuously to prevent and remove barriers to accessibility at every level of our organization as per the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Ontario Human Rights Code.

Aim/Purpose:

The purpose of this policy is to outline the practices we follow to ensure people with disabilities, whether they be clients, members of the public, employees, or partners, are treated respectfully and equitably, in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Ontario Human Rights Code.

Scope

This policy applies to all Fedcap Canada employees and all individuals who provide services on behalf of Fedcap Canada, including contractors, subcontractors, secondees, agency personnel, and contracted third parties. The policy addresses AODA training, accessible customer service delivery, accessible information and communications, accessible employment practices, and workplace discrimination, harassment, and violence toward people with disabilities. It is the responsibility of all Fedcap Canada employees and those who provide services on behalf of the organization to adhere to the guidelines set out in this policy.

Note: Fedcap Canada uses the broad definition provided by the AODA to define “disability,” which states that disability can happen at birth, as a person ages, or through illness or injury. Furthermore, it outlines several types of disabilities, which are as follows:

- Physical disabilities, such as diabetes, epilepsy, a brain injury, paralysis, amputation, lack of coordination, visual impairment, hearing impairment, speech impairment, and/or relying on a service animal, wheelchair, or other assistive device
- Mental impairment or developmental disabilities
- Learning disabilities
- Mental health disabilities
- Injuries or disabilities that allow someone to claim or receive benefits under the Workplace Safety and Insurance Act (1997)

Fedcap Canada acknowledges that this list constitutes examples, rather than an exhaustive list of all disabilities.

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Procedures:

The following procedures are discussed in this policy:

- A. Training
- B. Customer Service
- C. Information and Communications
- D. Employment
- E. Workplace Discrimination, Harassment, and Violence

A. Training

We are committed to training our employees in Ontario's accessibility laws and aspects of the Ontario Human Rights Code that relate to persons with disabilities, as per AODA requirements. Training includes:

- the purpose of the AODA
- an overview of the AODA Customer Service Standard
- how to interact with people with various types of disabilities
- how to interact with people who use an assistive device or require the assistance of a service animal or support person
- how to use any assistive devices that may be available on our premises
- what to do if a person with a disability is having difficulty accessing our services or facilities

We also ensure employees are trained in specific areas of the AODA that are relevant to their work responsibilities, including the Employment Standard and the Information and Communications Standard.

This training will be received by all employees, those involved in policy development, and anyone who provides services on behalf of Fedcap Canada. Training will be completed as soon as possible after an employee joins the organization.

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

B. Customer Service

Fedcap Canada is committed to delivering excellent customer service to all people, including people with disabilities. We abide by principles and requirements of the AODA Customer Service Standard to identify, prevent, and remove potential barriers to our services, including:

- Physical obstacles
- Technology
- Information and communication
- Our practices or procedures
- Attitudes of employees

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All employees, policymakers, and those who provide services on behalf of the organization are trained on the AODA Customer Service Standard, which includes education on how to interact with people with various types of disabilities, assistive devices, service animals and support persons, and what to do when an individual is having trouble accessing our services or facilities. Moreover, the Fedcap Canada Employee Manual includes our Accessible Customer Service Policy.

1. Assistive Devices

Fedcap Canada allows and invites people with disabilities to use their personal assistive devices when accessing our services or facilities. In the rare case where an assistive device presents a significant and unavoidable health or safety concern or is not permitted for other reasons, other measures will be taken to ensure the person with a disability can access our services or facilities.

Fedcap Canada employees are made familiar with various assistive devices that may be used by people with disabilities while accessing our services or facilities.

2. Service Animals

We welcome the accompaniment of service animals for those with disabilities accessing our services or facilities. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. When we cannot easily identify that an animal is a service animal, a Fedcap Canada employee may ask for documentation (i.e., a template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

According to the AODA, a regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

In the rare circumstance that service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our services or facilities, we will explain why the animal is excluded and discuss another way of providing our services or facilities with the person in question.

3. Support Persons

A person with a disability who is accompanied by a support person will be welcome to have that person accompany them on Fedcap Canada premises and when accessing our services. Support person here refers to a person who may provide one or more types of assistance, such as:

- Guiding person with vision loss
- Interpretation, such as American Sign Language (ASL)
- Personal care assistant
- Support person in the event of a seizure

4. Notice of Disruption of Services

In the event of a planned or unexpected disruption to services or facilities typically used by people with disabilities, Fedcap Canada will post a notice promptly. All notices will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. For example, if an accessible washroom is closed, we will post a notice on the door to the washroom.

5. Notice of Availability and Format of Documents

Fedcap Canada notifies the public on the Accessibility page of our website that any public documents related to accessible customer service are available in accessible formats or with communication support upon request.

When a request for documents is made, we will consult with the person making the request to determine the suitability of the format or communication support. We will provide the requested accessible-format document in a timely manner and at no additional cost to the individual. Please direct requests to contact.us@fedcapcanada.ca

6. Feedback

Fedcap Canada invites and welcomes feedback on how we provide accessible customer service. To ensure the feedback process is accessible, we will provide or arrange for accessible formats and communication supports on request. Fedcap Canada is committed to responding promptly to this feedback, and to work to remove identified barriers for people with disabilities in our service delivery. Please direct comments to contact.us@fedcapcanada.ca

C. Information and Communications

Fedcap Canada will communicate with people with disabilities in ways that consider their disability and their preferred methods of communication. When requested, we will provide information about our organization and its services in accessible formats or with communication supports. This includes emergency and public safety information, such as brochures or evacuation plans. We will strive to follow best practices for accessibility when creating documents, training materials, and other content.

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In addition, Fedcap Canada will ensure our website and web content meet Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

D. Employment

Fedcap Canada is an equal opportunity employer. We warmly welcome people with disabilities to be part of our diverse team and seek to ensure an accessible hiring process. We strive to create an inclusive environment for employees with disabilities, so that they may fully participate in all aspects of the workplace. To do this, we follow the accessible Employment Standard of the AODA.

1. Recruitment and Hiring

Fedcap Canada will make it known to our employees and the public that we welcome employees with disabilities and that accommodations can be made for employees and applicants with disabilities. Fedcap Canada job postings will include notice that applicants with disabilities may request accommodations in relation to hiring materials and processes. Additionally, offers of acceptance will notify new hires of our Accessibility Policy.

We will work in consultation with applicants with disabilities to ensure their accessibility needs are met. Accommodations in the recruitment and hiring process may include but are not limited to:

- Documents in accessible formats
- An American Sign Language (ASL) interpreter for interviews
- An interview scheduled during a time of day when the applicant is most focused or best able to communicate
- An interview location accessible for someone using a mobility device
- Advance copies of interview questions
- Good lighting and/or seating arrangements where the candidate can see interviewers clearly
- The use of alternate communication methods or devices
- An alternate interview format (I.e., telephone, Zoom, face-to-face)
- Additional time to answer and/or ask questions

Fedcap Canada will maintain the confidentiality of information related to an accommodation request and will only disclose this information on an as-needed basis with the consent of the applicant.

2. Accommodation Requests

Fedcap Canada will provide reasonable accommodations to employees with disabilities upon request of the individual, although there may be times a supervisor will ask an employee whether an accommodation would help them perform certain job tasks. We will work cooperatively and respectfully with all partners in the accommodation process.

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All accommodation requests will be taken seriously. No person will be penalized for making an accommodation request.

Examples of reasonable accommodation requests include:

- making existing facilities accessible
- job-restructuring
- part-time or modified work schedules
- acquiring or modifying equipment
- workplace information in an accessible format
- providing qualified readers or interpreters

To make an accommodation request, employees should contact their supervisor and, preferably in writing, submit a request which includes sufficient information to explain why the accommodation is required and the specific needs to be met. Fedcap Canada will work in consultation with the employee to ensure the appropriate accommodation is selected.

Fedcap Canada is committed to promptly responding to accommodation requests and will strive to make the accommodation process as expeditious and convenient as possible for the employee. Where necessary, interim accommodations will be provided while long-term solutions are developed. Where expert assistance is required to identify accommodation needs or potential solutions, the accommodation seeker is required to cooperate in obtaining that expert advice. Any costs associated with obtaining such expert advice will be borne by Fedcap Canada.

Fedcap Canada will provide accommodations insofar as they will not create undue hardship for the organization. Undue hardship takes into consideration cost, outside sources of funding, and health and safety. Fedcap Canada may deny an accommodation request, however, this denial must be in writing.

3. Individual Accommodation Plans

An individual accommodation plan is created once a request for accommodation has been made and is a written document that lists all accommodations that a worker with disabilities needs to make their job accessible.

First, an employee with disabilities and their supervisor will discuss the need for accommodation, as well as the specific needs of the employee to perform certain job functions. Some examples of job functions that could be performed with accommodations include:

- Accessing the workplace or workstation
- Communicating verbally or in writing
- Maintaining focus, organization, or energy level
- Coping with stress or social situations

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This discussion will inform the development of the plan. Others involved in developing individual accommodation plans may include Human Resources, the Office Manager, a volunteer from the workplace, or a medical professional or other expert consulted at Redcap Canada's expense.

The employee and supervisor will write the individual accommodation plan together and sign the finished plan once it has been approved by the employee in question and by Senior Leadership. The plan will be reassessed and reconfigured as needed, in conjunction with the employee.

4. Accessible Emergency Plans

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency and create a plan of action in case of a workplace emergency. As soon as practicable after we become aware of the need for accommodation due to the employee's disability, we will provide the relevant information and begin formulating an Accessible Emergency Plan.

The Accessible Emergency Plan will be created by the employee and their supervisor, in conjunction with the Office Manager. With the employee's consent, this information will also be shared with a designated person who will aid the employee during an emergency.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization,
- b) when the employee's overall accommodation needs are reviewed, and
- c) when Fedcap Canada reviews its emergency response policies.

5. Performance Management and Career Development

Our performance management and career development processes take into account the accessibility needs of our employees. For an employee with disabilities, at all stages of their career at Fedcap Canada, accessibility is considered and prioritized to ensure fair evaluation and equal opportunities for advancement.

6. Disclosure and Confidentiality

An employee may choose to disclose their disability as an applicant during the hiring process, or any time after beginning employment. An employee is not required to disclose a specific medical diagnosis to receive accommodation. However, they may need to disclose that they have a disability that impacts how they perform certain job functions. Under the AODA, an employer may ask for more information about a person's disability only as it pertains to carrying out aspects of their job, and/or request an expert opinion before granting a particular accommodation. However, the employer is required to cover the cost of any advice or opinion they request.

Unless an individual chooses to disclose aspects of their disability to others, all information about an employee's accommodation and disability will remain confidential, except in cases when colleagues or others are involved in the accommodation process.

Human Resources will maintain documented information related to:

- The initial accommodation request
- The Individual Accommodation Plan
- The Accessible Emergency Plan
- Any relevant documentation provided by the employee or by experts
- Notes from any meetings
- Any accommodation alternatives explored
- Any accommodations provided

This information will be stored in a secure location, separate from the employee's personnel file. Certain documents may be shared internally, with the knowledge and consent of the employee, with those who require it to ensure the employee's accessibility needs are met (i.e., the Office Manager).

7. Employee Feedback

Fedcap Canada invites and welcomes feedback from employees about our policies and practices around accessibility. Please direct comments and questions to Rashmi Nautiyal: rnautiyal@fedcapcanada.ca

E. Workplace Discrimination, Harassment, and Violence

Under the Ontario Human Rights Code (hereafter referred to as "the Code"), every person has the right to be free from harassment and discrimination, including people with disabilities. Fedcap Canada is committed to preventing, identifying, and correcting workplace discrimination, harassment, and violence.

1. Defining Discrimination

As defined in the Code, discrimination "includes, but is not limited to, a differential act, system or behaviour which differentiates between individuals or groups, imposes a disadvantage or withholds an advantage with respect to employment on the basis of any protected ground." Disability is a protected ground, and as such, discrimination against employees with disabilities will not be tolerated by Fedcap Canada. Discrimination may be intentional or unintentional. It may be direct and obvious, or may take more subtle, less obvious forms.

2. Defining Harassment

The Code defines harassment as "engaging in a course of vexatious [annoying or provoking] comment or conduct which is known or ought reasonably to be known to be unwelcome." This includes words or actions which are known to be offensive, embarrassing, humiliating,

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demeaning or unwelcome. Harassment can occur based on any of the grounds of discrimination, including disability.

3. Responding to Discrimination or Harassment in the Workplace

Any Fedcap Canada employee who believes that they have been subjected to or witnessed workplace harassment or discrimination based on disability is encouraged to follow the complaints procedure outlined in the Workplace Discrimination, Harassment, and Violence Policy found in the Fedcap Canada Employee Policy Manual. Fedcap Canada will ensure that employees do not suffer any reprisal as a result in coming forward in good faith with a complaint of workplace discrimination, harassment or violence.

When a complaint has been submitted, as per the Workplace Discrimination, Harassment and Violence Policy, an HR Representative will investigate in a fair and timely manner. If a claim of harassment, discrimination or violence is proven, the HR Team will determine whether disciplinary measures will be applied.

Obtain this Policy in an Accessible Format

To receive a copy of this policy in an alternative format, please direct your request to:
contact.us@fedcapcanada.ca

This policy has been adapted from the following documents: The [Accessibility for Ontarians with Disabilities Act, 2005](#); [The Ontario Human Rights Code](#); Various guiding documents found on [aoda.ca](#)

Responsibility:

All Fedcap Canada staff are required to follow this policy.

Non-Conformance:

Non-Conformance to this policy will be addressed in line with the requirements as stated in the Employee Conduct section of the Employee Manual.

Exception:

Not applicable.

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Document Control

This policy will be reviewed at least annually. This policy is owned by Fedcap Canada.

Version	Effective Date	Change Details	Author/Editor	Approved by	Approval Date	Next Review Date
1.0	17Mar2022	New Policy	Becca Cheskes	James Wellings	17Mar2022	17Mar2023
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