



Archdiocese  
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# **Accessibility for Ontarians with Disabilities Act**

Statement of Commitment  
Integrated Accessibility Standards Regulation  
and  
Multi-year Accessibility Plan  
*Revised and restated April 2021*

This plan is available on the Archdiocese of Toronto website at:  
<https://www.archtoronto.org/about-us/safe-environment/accessibility>.

Alternative formats of this document are available upon request.

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# AODA Policy and Multi-year Accessibility Plan

Revised and restated 2021

## Policy

The Archdiocese of Toronto is committed to working towards being compliant with all the standards under the **Accessibility for Ontarians with Disabilities Act (AODA)**, as they become law.

The Archdiocese of Toronto recognizes the fundamental importance of developing, implementing and enforcing standards in a timely manner in order to achieve accessibility to Ontarians with disabilities.

The Archdiocese of Toronto is committed to the principles of *independence, dignity, integration and equality of opportunity* and to meeting the needs of people with disabilities, through the implementation of this policy.

The Archdiocese of Toronto is committed to establishing, maintaining and implementing policies, as well as associated practices and procedures of the Integrated Accessibility Standards Regulation (IASR) (O. Reg. 191/11), specifically in the areas of customer service, information, communications, employment, and the design of public spaces and to meet the accessibility needs of people with disabilities in a timely manner.

The Archdiocese of Toronto is committed to the establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the Archdiocese's strategies to prevent and remove barriers and meet its requirements under the IASR.

The multi-year accessibility plan will indicate how the Archdiocese of Toronto intends to implement the requirements of the IASR within the legislated timelines.

The Archdiocese of Toronto, when providing information to, or communicating with, a person with a disability, will provide information and communication in a manner that takes into account the person's disability.

The commitments in this policy are intended to ensure that accessibility remains a priority in the Archdiocese of Toronto's decision-making process and will serve to assist in ensuring that decisions do not inadvertently create barriers.

## **Scope**

This policy applies to the Archdiocese of Toronto's:

- Clergy
- Employees
- Volunteers
- Visitors
- Applicants for employment who may require employment accommodation through the recruitment, assessment, selection and hiring process.

## **Responsibility**

Bishops, pastors, managers, immediate supervisors and department heads are responsible for ensuring that all clergy, employees and volunteers (as appropriate) follow guidelines set out in this policy.

They are also responsible to ensure that all clergy, employees and volunteers (as appropriate) are trained under the Accessibility Regulation and Standards under the AODA, the Human Rights Code and all related policies, practices and procedures.

All employees, volunteers, contractors, and any other person acting on behalf of the Archdiocese of Toronto are responsible for adhering to and following the commitments set out in this policy.

## Definitions

“**Accessibility**” means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.

“**Accessible formats**” may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

“**Accommodation**” means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities.

“**Barriers**” are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.

“**Communications**” means the interactions between two or more persons or entities, or any combination of them, when information is provided, sent or received.

“**Communications supports**” may include but are not limited to, captioning, alternative and augmenting communication supports, plain language, sign language and any other supports that facilitate effective communications.

“**Dignity**” means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

“**Disability**” — Ontario’s accessibility law adopts the definition for disability that is in the Ontario Human Rights Code. It defines disability broadly:

- a) "any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997."

**“Equal opportunity”** means service is provided to individuals in such a way that they have an opportunity to access goods and services equal to that given to others.

**“Independence”** means when a person is able to do things on their own without unnecessary help or interference from others.

**“Information”** includes data, facts and knowledge that exist in any format, including text, audio, digital or images and that conveys meaning.

**“Integration”** means service is provided in a way that allows the individual to benefit from equivalent services, in the same place and in the same manner or similar way, as other individuals, unless an alternative measure is necessary to enable the individual to access goods or services.

**“Reasonable efforts”** means taking approaches that meet the required needs of the individual.

## Introduction & Statement of Commitment

The **Integrated Accessibility Standards Regulation (IASR)** under the **Accessibility for Ontarians with Disabilities Act (AODA)** requires the Archdiocese of Toronto to develop a multi-year plan to prevent and remove barriers for persons with disabilities.

Since 2010, the Archdiocese of Toronto has set a course to prevent, identify and remove barriers for persons with disabilities. Through its multi-year accessibility plan, the Archdiocese of Toronto aims to become barrier-free by 2025.

This course includes complying with the following accessibility standards which relate to our organization:

- Customer Service
- Information and Communications
- Employment
- Design of Public Spaces

The Archdiocese of Toronto's accessibility plan will help to form planning requirements under the Integrated Accessibility Standards Regulation (IASR) enacted July 1, 2011 under the **Accessibility for Ontarians with Disabilities Act (AODA)**. The AODA requires the Archdiocese of Toronto to develop, implement and enforce accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures and premises are accessible to persons with disabilities.

The multi-year accessibility plan outlines the specific steps the Archdiocese of Toronto is taking to improve opportunities for persons with disabilities and comply with the phased-in requirements of the Regulation.

This plan has been developed by the Accessibility Advisor, in consultation with various stakeholders, and in accordance with the IASR. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA. It will be provided in an alternative format upon request.

In accordance with the requirements, the Archdiocese of Toronto will:

- Review and update the plan at least once every five years.
- Report on its website the progress on implementing this plan.
- Provide all information relating to the plan in alternative formats, upon request.

The Archdiocese will review, on a yearly basis, the status of the implementation to remove and prevent barriers to achieve accessibility under the AODA.

# Emergency Response and Evacuation Plan Information

The Archdiocese of Toronto incorporated accessibility considerations into its emergency response and evacuation plan and procedures for employees and public.

## Completed Actions:

- Individualized workplace emergency response information is available to employees, who have disclosed a disability, and such employees will be accommodated according to their disability when and if an emergency or disaster occurs. These individualized plans will be communicated to their managers and recorded in their personnel files.
- Employees have been trained on the emergency response plan and/or public safety information and instructions to ensure that they know how to interact with persons with disabilities during an emergency, incident or dangerous situation.
- Instructions were provided to staff regarding evacuation in times of emergency to gather at locations that are accessible.
- Persons with various disabilities were consulted to ensure that we met the needs of all persons with disabilities in our emergency response plan, and that public safety information and instructions are provided in a timely manner if an emergency or disaster occurs.
- Fire and disaster wardens were instructed to identify persons in need of assistance in advance of an emergency to discuss the location of the designated waiting areas are how identified persons will be safely evacuated in the event of an emergency.
- The emergency response plan and public safety information for employees is posted on the employee website.
- The emergency response plan and public safety information is available in an accessible format or with appropriate communication supports upon request.
- The Archdiocese of Toronto's Emergency Response Plan was reviewed and updated, August 2019 and in April 2021 information regarding pandemics was updated based on learnings from the Covid-19 pandemic.

## Planned Actions:

- The Archdiocese will regularly review our current workplace emergency response and evacuation plan and procedures and post information regarding our procedures in public areas.
- Individualized emergency response information will be reviewed when:
  - a) An employee moves to a different location in the organization
  - b) An employee's overall needs or plans are reviewed; and
  - c) When reviewing general emergency response policies

**Required legislative compliance:** January 1, 2012

**Status:** Implemented/addressed on an individual basis as need arises

# **Integrated Accessibility Standard (IASR)**

## **General Requirements**

### **Accessibility Policy**

The Archdiocese of Toronto's accessibility policy and supporting procedures outline our commitment to eliminating barriers and improving accessibility.

#### **Completed Actions:**

- Created a policy that addresses how the Archdiocese of Toronto will achieve or has achieved accessibility through meeting the IASR's requirements.
- The Archdiocese of Toronto's IASR policy and statement of commitment is available to the public on the premises and on the Archdiocesan website.
- The Archdiocese of Toronto IASR policy and statement of commitment is available in an accessible format upon request. The Archdiocese will consult with the person with a disability when identifying the appropriate format.
- The AODA Policy was updated to reflect the changes to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act (AODA), which came into effect on July 1, 2016.
- The AODA Policy was reviewed and updated in April 2021.

#### **Planned Actions:**

- Regularly review the policy and statement of commitment and make necessary adjustments if required.

**Required legislative compliance:** January 1, 2014

**Status:** Implemented/ongoing

## **Multi-year Accessibility Plan**

The Archdiocese of Toronto multi-year accessibility plan outlines the specific steps we are taking to prevent and remove barriers and comply with current and future requirements of the AODA.

### **Completed Actions:**

- Established, implemented, and documented the Archdiocese of Toronto's multi-year accessibility plan.
- Posted the accessibility plan on our website and have the plan available in an accessible format upon request.
- The multi-year accessibility plan was updated to reflect the changes to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act (AODA), which came into effect on July 1, 2016.
- The multi-year accessibility plan is regularly reviewed and updated as per regulation requirements (at least once every five years).

### **Planned Actions:**

- Maintain the Archdiocese of Toronto's multi-year accessibility plan.
- Continue to Review and update the accessibility plan at least once every five years.

**Required legislative compliance:** January 1, 2014

**Status:** Implemented/updated/ongoing

## **Training**

The Archdiocese of Toronto is committed to providing all those who interact with the public including existing/new employees, volunteers, contractors, and others acting on behalf of the Archdiocese, as well, all persons who participate in developing organizational policies, training on the requirements of the Accessibility for Ontarians with Disabilities Act, 2005; Integrated Accessibility Standards Regulation including Accessibility Standards for Customer Service; and the Human Rights Code as it pertains to people with disabilities.

### **Completed Actions:**

- The Archdiocese of Toronto provides training for employees and others (as required) on the requirements of the Regulation, as well as Code-related obligations through mandatory training offered through the Archdiocese Human Resources department.
- Retain a record of training, including dates and number of individuals whom have been trained.
- Ensure training on the requirements is provided to new personnel as soon as it is practicable after an individual commences their position.
- Training documents were updated to reflect changes to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act (AODA), which came into effect on July 1, 2016.
- Employees were informed of the AODA changes, which came into effect on July 1, 2016.
- Employees were provided refresher training, April 2021.

### **Planned Actions:**

- Maintain the record of training, adding all new trainees' information when trained.
- Provide training in respect to any changes to policies on an ongoing basis.

**Required legislative compliance:** January 1, 2015

**Status:** Implemented/ongoing

# Customer Service Standard

The Archdiocese of Toronto has developed policies to comply with the Customer Service Standard Regulation and will continue to comply and implement the requirements under this standard.

## Completed Actions:

- Established policies, procedures and practices for providing goods and services to persons with disabilities and posted these in a conspicuous area and on the Archdiocesan website.
- Provided accessibility awareness, AODA and customer service standard training to all staff/volunteers and to those who are involved in the creation and implementation of policies, practices and procedures for the Archdiocese of Toronto.
- Developed and retain a record of attendance for accessibility training courses.
- Worked with persons in charge of facilities to develop a notification service disruption protocol.
- Added an “Accessibility” button to the Archdiocesan website to communicate the customer service policy and provide instructions for enhanced accessibility offerings.
- Created a customer service policy that highlights information about accessibility requirements under the AODA including policies, guidelines and mandatory and recommended training requirements for staff and management.
- Technological enhancements were added to our information and communication and websites, for the purpose of improving interaction and communication with persons with disabilities.
- Reported compliance on the Customer Service Standard on the Accessibility Compliance Reporting tool at Service Ontario’s One-Source for Business website.

## Planned Actions:

- Continue to provide reasonable accommodation to “customers” (parishioners) on a case by case basis and a yearly review of the types of accommodation requests we receive will determine how we can improve accessibility.
- Continue to assess premises and other areas where barriers may exist that prevent access to our goods and services.
- Continue to provide appropriate accessible way of finding signage and instruction to visitors.
- Continue to encourage staff to consider accessibility when planning religious ceremonies, meetings and events with parishioners, staff, customers, including vendors and suppliers.
- Remind persons responsible of the building-specific service disruption notification protocols.
- Consider accessibility-related feedback received through all channels (i.e. online feedback form, correspondence, inquiries, meeting evaluations, etc.) by assessing and responding to feedback, as required.
- Regularly review the effectiveness of policy, procedures and practices and make necessary adjustments.
- Continue to highlight Customer Service Policy in education, training and activities.

- New staff/volunteers and those who have not yet received training will be provided AODA training as soon as it is feasible.
- Updated training will be provided when there are changes to the accessibility policies.
- Continue to track and report on training compliance.

**Required legislative compliance:** January 1, 2012

**Status:** Implemented/ongoing

# Information and Communications Standard

The Archdiocese of Toronto will incorporate accessibility requirements under the information and communications standard to ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of persons with disabilities. The Archdiocese of Toronto will endeavour to provide necessary communication supports in a timely manner.

## Accessible Websites

The Archdiocese of Toronto's main website and parish sub-sites, including web content, will conform to the Regulations, except where it is not practicable.

### Completed Actions:

- Posted the accessibility policy and plan on the main site and all sub-sites.
- Created a Web Accessibility Committee to plan for making our Websites accessible to persons with disabilities.
- Developed accessibility guidelines and priorities in the implementation of accessible websites.
- With the Web Accessibility Committee, organized professional training sessions for the webmasters and ongoing training thereafter for new webmasters.
- Purchased license for web accessibility software and assigned support staff to implement ongoing organization-wide reports.
- Initiated a review process to ensure the main site and all sub-sites and web content on those sites conform to WCAG 2.0.
- Updated the AODA sections of the Archdiocese of Toronto's main website and employee website to reflect the changes to the Customer Service Standard under the Accessibility for Ontarians with Disabilities Act (AODA), which came into effect on July 1, 2016.
- Archdiocesan website and parish sub-sites were updated to comply with WCAG 2.0, Level AA as of January 2021.
- Posted updated accessibility policy, plan and training on the main website and employee website.

### Planned Actions:

- When designing or updating Internet websites, the Archdiocese of Toronto will ensure that it is developed in accordance with the Regulation.

**Required legislative compliance:** January 1, 2014 (WCAG 2.0, Level A)  
January 1, 2021 (WCAG 2.0, Level AA)

**Status:** Implemented/ongoing

## **Feedback**

To comply with section 11 of the IASR, the Archdiocese of Toronto put into place a feedback process to receive and respond to feedback about the manner in which we provide goods or services to people with disabilities.

### **Completed Actions:**

- Ensure that process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.
- Consult with the person making the request to determine suitability of format.
- Notification to the public of the availability of accessible formats and communication supports is noted on various locations including but not limited to, documents, websites and forms.

### **Planned Actions:**

- Regularly review feedback received to look for ways to remove barriers to accessibility and improve our customer service.

**Required legislative compliance:** January 1, 2015

**Status:** Implemented/ongoing

## **Accessible Formats and Communication Supports**

The Archdiocese of Toronto will provide, or will arrange for the provision of, accessible formats and communication supports with respect to Archdiocesan generated documents, to persons with disabilities upon request. The Archdiocese will do so in a timely manner and in a way that considers the persons accessibility needs due to disability.

### **Completed Actions:**

- Consult with the person making the request for accessible formats or communication supports and provide the information at a cost that is no more than the regular cost charged to others.
- Notification to the public of the availability of accessible formats and communication supports is noted on various locations including but not limited to, documents, websites and forms.

### **Planned Actions:**

- Continue to provide training to webmasters on how to create accessible documents.

**Required legislative compliance:** January 1, 2016

**Status:** Implemented/ongoing

# Employment Standard

The Archdiocese of Toronto is committed to fair and accessible employment practices that attract and retain talented employees with disabilities. The Archdiocese of Toronto will incorporate accessibility requirements under the employment standard to ensure that barriers are eliminated and corporate policies are followed where applicable.

## Recruitment

The Archdiocese of Toronto will assess recruitment policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of persons with disabilities.

### Completed Actions:

- Specify on the Archdiocese of Toronto's website and in job advertisements, that accommodation is available for applicants with disabilities upon request.
- Notify employees and the public about the availability of accommodation in its recruitment processes for applicants with disabilities.
- Inform candidates about the availability of accommodations:
  - when called for an interview
  - during the selection process
  - at the time of job offer
  - at orientation
- If the selected applicant requests an accommodation, consult with the applicant and arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs.
- When making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities.
- Provided parishes with the same structure for recruitment as the Catholic Pastoral Centre, which includes standard job advertisement template and a guideline document on how to invite persons with disabilities to apply for positions.

### Planned Actions:

- Continue to promote/welcome persons with disabilities to apply for positions within the Archdiocese of Toronto.

**Required legislative compliance:** January 1, 2016

**Status:** Implemented/ongoing

## **Support Information for Employees**

The Archdiocese of Toronto will assess its supporting documents, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of persons with disabilities.

### **Completed Actions:**

- Inform current employees and new hires soon after they begin employment of the Archdiocese of Toronto's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.
- Provide information under this section to new employees as soon as practicable after they begin their employment.
- Keep employees up to date on changes to policies.
- Provide accessible formats and communication supports to any employees who request them. If requested, the Archdiocese will consult with the employee to provide or arrange for provision of accessible formats and communication supports for:
  - information that is needed in order to perform the employee's job
  - information that is generally available to employees in the workplace

**Required legislative compliance:** January 1, 2016

**Status:** Implemented/ongoing

## **Documented Individualized Accommodation Plans**

The Archdiocese of Toronto will assess its return-to-work and accommodation plans, practices and procedures, methods and attitudes to identify and remove barriers to employment of persons with disabilities.

### **Completed Actions:**

- The process allows the employee requesting accommodation to participate in the development of the plan.
- The process includes a means by which the employee is assessed on an individual basis.
- Individualized accommodation plan is provided in writing to any employee with a disability.
- The Archdiocese can request an evaluation by an outside medical or other expert, at the Archdiocese's expense, to assist the Archdiocese in determining if and how accommodation can be achieved.
- Provide an individualized return-to-work plan in writing for any employee who has been absent from work due to a disability and requires disability-related accommodations to return to work.
- Steps are taken to protect the privacy of the employee's personal information.
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which it will be done.
- Provide the employee with the reasons for the denial if the individual accommodation plan is denied.
- Provide the individual accommodation plan in a format that takes into account the employee's accessibility needs.
- Any individualized workplace emergency response information is included in the plan.
- Identify any other accommodation that is to be provided to the employee, including ergonomic assessments and assistive devices, as required.

**Required legislative compliance:** January 1, 2016

**Status:** Implemented/ongoing

## **Performance Assessment, Career Development and Advancement and Redeployment**

The Archdiocese of Toronto will assess its performance reviews, career development and advancement, redeployment programs, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of persons with disabilities.

### **Completed Actions:**

- Regularly review and revise the Archdiocesan performance development process as needed.
- Ensure the accessibility needs of employees with disabilities and their individualized accommodation plans are taken into account:
  - when assessing their performance
  - in managing their career development and advancement
  - when redeploying them
- Provide information regarding performance management, career development and advancement, and redeployment in an accessible format upon request.
- Accessibility objectives will be included in yearly performance development plans for employees as needed.

**Required legislative compliance:** January 1, 2016

**Status:** Implemented/ongoing

## **Design of Public Spaces Standard**

The Archdiocese of Toronto is committed to greater accessibility in, out of, and around the buildings we use. The Archdiocese of Toronto will ensure that facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.

### **Completed Actions:**

- Exterior paths of travel (sidewalks or walkways) and associated elements such as ramps, stairs, and curb ramps, when renovated and/or built new comply with the set Regulations.
- Accessible off-street parking spaces when renovated and/or built new comply with the set Regulations.
- When renovated/new spaces are being built, service counters and waiting areas/lines will comply with the set Regulations.
- The Archdiocese of Toronto is committed to maintaining the accessible parts of our public spaces. When any renovation/new construction to an accessible area is underway the Archdiocese will post a sign to explain the disruption and set up a temporary alternative.

### **Planned Actions:**

- Continue to comply with all set Regulations under the Design of Public Spaces Standard and keep abreast regarding any changes to the set Regulations.

**Required legislative compliance:** January 1, 2017

**Status:** Implemented/ongoing

## **Transportation Standard**

This standard does not apply to the Archdiocese of Toronto.

## How to Contact Us

The Archdiocese of Toronto has a process in place for receiving and responding to feedback that is accessible to persons with disabilities. For more information, questions, or concerns regarding accessibility at the Archdiocese of Toronto or to request communication in an accessible format please contact the Human Resources department.

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