



Accessibility Policies

Intent

The policies contained in this document are intended to meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and its associated regulations, *Ontario Regulation 191/11, Integrated Accessibility Standards* and *Ontario Regulation 429/07, Accessibility Standards for Customer Service*.

The purpose of the AODA is to benefit all Ontarians by developing, implementing, and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises on or before January 1, 2025. The specific accessibility standards that must be followed by Ontario organizations are set out in the two regulations. This policy document addresses the requirements of the Act and associated regulations as they apply to The Sunshine Foundation of Canada (“Sunshine”).

This policy document addresses the following:

- A. Statement of Commitment
- B. The Accessibility Standards
- C. Training
- D. Acknowledgement & Agreement

A. Statement of Commitment

Sunshine is committed to providing a barrier-free environment for all stakeholders including our clients, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the AODA and its associated standards and regulations.

Sunshine understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and as an organization, Sunshine is committed to working with the necessary parties to make accessibility for all a reality.

B. The Accessibility Standards

Integrated Accessibility Standards

The Integrated Accessibility Standards Regulation (the “IASR”) establishes accessibility standards for the following:

- Information and communications,
- Employment,
- Transportation, and
- Design of public spaces.

The standards on transportation and the design of public spaces do not apply to Sunshine.

Sunshine’s policy on the provision of information and communications services and materials to persons with disabilities is set out in Appendix I.

Sunshine’s policy on the provision of employment services to persons with disabilities is set out in Appendix II.

Customer Service Standards

The Accessibility Standards for Customer Service Regulation (the “ASCSR”) requires organizations to make customer service more accessible to persons with disabilities by identifying and removing barriers that prevent them from accessing goods and services. Sunshine’s policy on the provision of accessible customer service is set out in Appendix III.

C. Training

Sunshine will train its staff, volunteers, and other persons in accordance with the requirements of the IASR and the ASCSR.

Integrated Accessibility Standards Training

Sunshine will provide training on the following to all employees, volunteers:

- The requirements of the accessibility standards contained in the IASR, and
- The Human Rights Code as it pertains to persons with disabilities.

The training will be appropriate to the duties of the employee or volunteer and will be provided as soon as is reasonably practicable. Training will be provided to new employees as part of the orientation process and will take place within one week of their start date. Training will be provided to new volunteers during the orientation process and before any volunteer activities are undertaken. Training will be provided on an ongoing basis as changes to Sunshine’s accessibility policies occur.

The materials for this training are contained in Sunshine's Accessibility Training Manual.

Customer Service Standards Training

Customer service training will be completed by the following people who either deal with Sunshine clients or are involved with the development and approval of client service policies, practices, and procedures:

- Programs Manager,
- Program Coordinators,
- Volunteers participating in Individual Dream presentations,
- Volunteers participating on a DreamLift,
- Chief Executive Officer, and
- Director of Finance and Administration.

Training will cover the following:

- A review of the purpose of the AODA.
- A review of the requirements of the ASCSR.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who use assistive devices, require the assistance of a guide dog, service dog or other service animal, or require the use of a support person.
- Instructions on what to do if a person with a disability is having difficulty accessing Sunshine's charitable programs.
- Sunshine's policies, procedures and practices pertaining to providing accessible customer service to clients with disabilities.

Sunshine will provide training as soon as practicable. Training will be provided to new employees as part of the orientation process and will take place within one week of their start date. Volunteers who will be participating in dream presentations and DreamLifts will be trained in advance of those events. Training will also be provided on an ongoing basis in connection with changes to policies, practices, and procedures governing the provision of customer service to persons with disabilities.

The materials for this training are contained in Sunshine's Accessible Customer Service Training Manual.

Updated: March 11, 2016



D. Accessibility Policies Acknowledgement & Agreement

I acknowledge that I have read and understand the Accessibility Policies of Sunshine and agree to abide by these policies.

Name: _____

Signature: _____

Date: _____

Appendix I

Accessible Information and Communications Policy

Intent

This policy is intended to meet the requirements of the IASR as they apply to the provision of information and communications services and materials for people with disabilities. This policy addresses the following:

- A. Feedback Process
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- E. Exceptions

A. Feedback Process

Sunshine will ensure that all feedback processes (both internal and external) are made accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Accessible formats include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities. Communication supports include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Sunshine will make the availability of accessible feedback formats publicly known via its website.

B. Accessible Formats and Communication Supports

Unless deemed unconvertible, Sunshine will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

Sunshine will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Sunshine will make the availability of accessible formats and communication supports publicly known via its website.

C. Accessible Websites and Web Content

Sunshine will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.

D. Exceptions

The Information and Communications Standard does not apply to:

- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Sunshine will ensure that the individual who made the request is provided with an explanation as to why this is the case as well as a summary of the unconvertible information.

Sunshine will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

Updated: March 11, 2016

Appendix II

Accessible Employment Policy

Intent

This policy is intended to meet the requirements of the IASR as it applies to the provision of accessible employment services for persons with disabilities. This policy addresses the following:

- A. Recruitment, Assessment and Selection
- B. Accessible Formats and Communication Supports for Employees
- C. Workplace Emergency Response Information
- D. Performance Management and Career Development and Advancement
- E. Redeployment

A. Recruitment, Assessment and Selection

Sunshine will notify employees and the public about the availability of accommodation for job applicants who have disabilities.

Applicants selected to participate in an assessment or selection process will be notified that accommodations are available upon request in relation to the materials or processes to be used. Where an accommodation is requested, Sunshine will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Sunshine's policies and supports for accommodating people with disabilities.

B. Accessible Formats and Communication Supports for Employees

Sunshine will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Sunshine will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Accessible formats include, but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities. Communication supports include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Sunshine will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

C. Workplace Emergency Response Information

Where necessary, Sunshine will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee. If the employee requires assistance Sunshine will, with the employee's consent, provide the workplace emergency response information to the person designated to provide that assistance to the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Sunshine reviews general emergency response policies.

D. Performance Management and Career Development and Advancement

Performance Management activities relate to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Sunshine will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required.

E. Redeployment

Redeployment is the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment. Individual accommodation plans will be consulted, as required.

Updated: March 11, 2016

Appendix III

Accessible Customer Service Policy

Intent

This policy is intended to meet the requirements of the Accessibility Standards for Customer Service Regulation. This law requires organizations to make customer service more accessible to persons with disabilities by identifying and removing barriers that prevent them from accessing goods and services. The provision of goods and services must be provided in a manner that respects the dignity and independence of persons with disabilities, is integrated with the organization's provision of goods and services to all people, and gives persons with disabilities equal opportunity to use and benefit from the goods or services.

The Sunshine Foundation of Canada's ("Sunshine") mission is to fulfill the dreams of children living with severe physical disabilities or life-threatening illnesses. Given that the majority of the children Sunshine serves have a physical disability, we are well-versed on the issue of accessibility. We must make our charitable programs accessible to children with disabilities in order to fulfill our mission.

It is important to note that accessibility needs can extend beyond the children we serve. To fulfill the dream of a child or to arrange the child's participation in a DreamLift requires the involvement the child's parent(s) or legal guardian in the application and planning process. We must also identify and remove barriers that could prevent parents and guardians with disabilities from accessing our services on behalf the child. Therefore, for the purposes of this policy, we will use of the term "client" to refer to a child who qualifies for Sunshine's programs as well as the parent(s) or legal guardian of the child, as the case may be.

This policy sets out Sunshine's policies, practices, and procedures for making our charitable programs accessible. In accordance with the Standards, this policy addresses the following:

- A. The Provision of Services to Persons with Disabilities;
- B. The Use of Service Animals, Support Persons, and Assistive Devices
- C. Notices of Temporary Disruptions
- D. Client Feedback
- E. Notice of Availability of Documents

A. The Provision of Services to Persons with Disabilities

Sunshine will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all clients receive the same value and quality,
- allowing clients with disabilities to do things in their own ways, at their own pace when accessing services as long as this does not present a safety risk,

- using alternative methods when possible to ensure that clients with disabilities have access to the same services in a similar manner,
- taking into account individual needs when providing services, and
- communicating in a manner that takes into account the client's disability.

B. Use of Service Animals, Support Persons, and Assistive Devices

The section within the Standards pertaining to the use of support animals and support persons applies if (a) services are provided to members of the public or other third parties at premises owned or operated by the service provider and (b) if the public or third parties have access to the premises.

While clients do visit Sunshine's premises from time to time, they are not open to the public. Delivery of Sunshine's charitable programs generally takes place in other locations; however, on occasion a dream presentation does take place on our premises. In those cases, Sunshine welcomes our clients' service animals and support persons, subject to the following:

- The client that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.
- If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Sunshine will make all reasonable efforts to meet the needs of all individuals.
- In situations where confidential information concerning the client might be discussed, consent will be obtained from the client prior to disclosing that information in the presence of the support person.

Persons with disabilities may use their own assistive devices as required. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used.

C. Notice of Temporary Disruptions

Sunshine's premises are not open to the public and Sunshine does not provide facilities or services that are particular to persons with disabilities that are not also provided to other persons. However, in the event of any temporary disruptions to facilities or services that client's with disabilities rely on to access or use Sunshine's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- services that are disrupted or unavailable,
- reason for the disruption,
- anticipated duration, and

- description of alternative services or options.

When disruptions occur Sunshine will provide notice by:

- posting notices on the Sunshine website,
- contacting clients, or
- by any other method that may be reasonable under the circumstances.

D. Client Feedback

Clients will be given the opportunity to provide feedback on the service provided to persons with disabilities during our annual quality assurance review of our charitable programs. Clients will initially be contacted by telephone and given the opportunity to provide their feedback verbally. When requested, we will facilitate the survey in accessible formats or with communication supports after consulting with our clients to determine their information and communication needs. Alternate methods of providing feedback will include completing a written survey via mail or email, completing an online survey, or arranging a meeting to complete the survey in person.

Additional feedback, including complaints, can be provided at any time by contacting Sunshine's Chief Executive Officer:

Name: Nancy Sutherland
Telephone: 1-800-461-7935 ext. 225
Email: nancy.sutherland@sunshine.ca
Address: 100-300 Wellington St, London, ON N6B 2L5

Clients that provide feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Information about the feedback process is available on Sunshine's website: www.sunshine.ca.

E. Notice of Availability of Documents

Sunshine shall notify clients that the documents related to the Accessibility Standard for Client Service are available upon request and in a format that takes into account the client's disability. Notification will be given by posting the information on Sunshine's website.

Updated: March 11, 2016