

Policy Name: Accessibility Policy	Policy No.: PLC-006
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1. PURPOSE

In compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, the purpose of this policy is to outline responsibilities of employees and volunteers on behalf of the YMCA Hamilton|Burlington|Brantford (the “YMCA HBB”) in providing goods, services, and opportunities to people with disabilities.

2. SCOPE

This policy applies to all employees, volunteers, contractors, other persons on site, and candidates for employment and/or volunteer positions.

3. POLICY STATEMENT

The YMCA HBB is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility obligations under the *Accessibility for Ontarians with Disabilities Act (AODA)* and Ontario’s accessibility laws.

The YMCA HBB is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code (OHRC) respecting non-discrimination.

The YMCA HBB understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the OHRC or obligations to people with disabilities under any other law.

The YMCA HBB is committed to excellence in serving and providing programs, services or facilities to all customers including people with disabilities.

This policy, together with information related to it, will be available in all of our YMCA HBB operational sites as well as on our website at www.ymcahbb.ca.

4. DEFINITIONS

Definitions taken from the *Accessibility for Ontarians with Disabilities Act, S.O. 2005, C. 11* or *Ontario Human Rights Code*.

“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.

“Barrier” refers to anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice; (“obstacle”).

“Disability” is defined broadly by the OHRC as:

1. "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 coordination, 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,
2. a condition of mental impairment or a developmental disability,
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. a mental disorder, or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997."

5. POLICY DETAILS

The YMCA HBB will make every reasonable effort to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*, including all applicable elements of the *Integrated Accessibility Standards*.

1. Information and Communication
2. Employment
3. Customer Service
4. Design of Public Spaces
5. Transportation

5.1. Training

The YMCA HBB will provide training to all employees, volunteers, and independent contractors to ensure they are familiar with our policies, practices, and procedures for communicating with and providing services to persons with disabilities.

5.2 Information and Communication

The YMCA HBB will make its information accessible to people with disabilities by creating materials and supports in accessible formats, and it will notify the public of the types of accessible formats provided.

Further, the YMCA HBB will deliver alternate formats of information to clients, upon request. If a particular material cannot be converted into an accessible format that meets the needs of the person requesting it, the YMCA HBB will provide details of why it cannot be converted and provide a summary of the information or communication in another way that is suitable to the person requesting it.

This extends to any emergency procedures or safety information prepared by the YMCA HBB.

5.3 Employment

The YMCA HBB welcomes and encourages employment applications from people with disabilities and will do its part to make hiring and employee support practices more accessible by providing accommodation during all stages of recruitment, hiring, and employment.

If a job applicant requests accommodation, the YMCA HBB will consult with the applicant and provide suitable accommodation that takes the person's accessibility needs into account.

When making offers of employment, the YMCA HBB will notify the successful applicant of its policies for accommodating employees with disabilities.

New employees will be reminded about the Association's job accommodation policies as soon as possible upon being hired and notified when any future changes are made to policies. Policy and practice information will include available employment accommodations that will be provided for job related matters such as performance management, career development, emergency response plans, and return to work information.

The YMCA HBB will consult with an employee who requests it, to provide or arrange for the provision of accessible formats and communication supports that take the employee's needs into account when providing information that is needed to perform the employee's job, and information that is generally available to employees in the workplace.

5.4 Customer Service

The YMCA HBB will make reasonable efforts to ensure that its customer service policies, practices and procedures are consistent with the four principles set out below. It is recognized, however, that in some circumstances, a balancing of the four principles, or aspects thereof, may be necessary to maximize the achievement by the YMCA of the goals and spirit of this policy.

The four principles are as follows:

1. Dignity

The YMCA HBB will strive to ensure its services are provided in a manner that respects the dignity of persons with disabilities. That is, the YMCA HBB will strive to ensure that persons with disabilities

who use its programs or services are treated in a manner consistent with them being just as deserving of effective, timely and full service as any other person.

2. Independence

The concept of independence as used in this policy is flexible and fact dependent. The following are just a few examples of how this term may apply in various situations:

- in appropriate circumstances, freedom to make one's own choice rather than being presented with a fixed situation or a single avenue;
- providing a person with the opportunity to do things their own way, subject to appropriate regard being given to health and safety requirements, the rights of others, and so on;
- Providing a person with appropriate opportunities to take the time they need to communicate their thoughts, or to complete tasks, without interference or unsolicited "help".

3. Integration

The YMCA HBB will strive to ensure that, unless an alternate measure (whether temporary or permanent) is necessary, the provision of its services to persons with disabilities is integrated with its provision of programs and services to others, to enable persons with disabilities to obtain, use or benefit from the YMCA HBB's services. Our goal is to ensure that as much as reasonably possible, persons with disabilities fully benefit from the same programs and services, in the same place, and in the same or similar manner, as other users of the YMCA HBB's programs and services. However, as noted, it is recognized that in some circumstances, complete integration will not be possible and that accordingly, it will be necessary for the YMCA HBB to use alternate measures (temporary or permanent, as may be necessary or appropriate) to provide some of its programs and services to persons with disabilities.

4. Equal Opportunity

In the context of this policy, "equal opportunity" means that a person with a disability who seeks to use the YMCA HBB's services generally will have the same or similar opportunities, options, benefits and results as a person who does not have a disability, without having to expend significantly more effort to access or obtain the service. However, "equal opportunity" does not necessarily mean "equal treatment"—in some circumstances, it may be necessary or appropriate to treat an individual differently from others to facilitate them fully benefiting from the YMCA HBB's services.

5.5 Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services, or facilities. Where a person with a disability uses an assistive device, the YMCA HBB will take reasonable and appropriate steps, consistent with the above-noted principles, to prevent or minimize the interference of such device with the YMCA HBB's delivery of its programs or services to such person.

The YMCA HBB will take reasonable steps to ensure its staff are familiarized with the types of assistive devices that may be used by individuals with disabilities who wish to use the YMCA HBB's programs or services so that, where necessary, appropriate fact-based determinations can be made regarding the use of such devices on its premises. In cases where the assistive device presents a significant and

unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities.

5.6 Service Animals

If a person with a disability is accompanied by a guide dog or other service animal, such person will be permitted to enter premises owned or operated by the YMCA HBB with the guide dog or animal, and to keep it with them, unless it otherwise is excluded by law from the premises or from portions of premises. For the purposes of this section, “guide dog” and “service animal” are defined as follows:

- **guide dog** – dog trained as a guide for a blind person and having the qualifications prescribed by the regulations under the Blind Persons’ Rights Act;
- **service animal** – an animal in regard to which:
 - a) it is readily apparent the animal is used by the person for reasons relating to their disability;
 - or
 - b) the person provides a letter from a regulated health professional confirming the person requires the animal for reasons relating to their disability;

NOTE: in (a) above, if it is not readily apparent to a person acting reasonably that the animal in fact is a service animal, a letter of the type referred to in sub-paragraph (b) may be requested by the YMCA HBB as a condition for allowing such animal onto its premises.

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 some circumstances, the use of a guide dog or service animal on the premises, or in a portion of the premises, may not appear to be feasible for reasons of health and safety. In such cases, the YMCA HBB will analyze the situation and consider options that may permit the guide dog or service animal to be used.

If a guide dog or service animal is excluded from the premises, or a portion of the premises, the YMCA HBB will ensure that measures are available to enable the person with a disability to obtain, use or benefit from the YMCA’s programs or services.

5.7 Support Persons

If a person with a disability is accompanied by a support person, the YMCA HBB will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

If a person with a disability is accompanied by a support person,

- both persons will be permitted to enter together upon premises that are owned or operated by the YMCA HBB; and
- the person with a disability will not be prevented from having access to such a support person while on the premises.

The YMCA HBB is entitled to require that a person with a disability be accompanied by a support person when on the premises it owns or operates if such support person is necessary to protect the health and safety of the person with the disability or the health and safety of others on the premises. Determinations regarding the need for a support person will be made reasonably, based on factual considerations concerning the ability of the person with a disability to meet such health and safety requirements.

Before making a decision, the YMCA HBB will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

If the YMCA HBB determines that a support person is required, we will waive the admission fee or fare (if applicable) for the support person provided that the person does not access the YMCA HBB's programs or services for their own personal use while also providing support to an individual with a disability.

For the purposes of this section, "support person" means another person who accompanies a person with a disability to help them with communication, mobility, personal care, or medical needs or with access to the YMCA HBB's programs or services. A support person may be a paid personal worker, a volunteer, a friend, or a family member.

Examples of the kind of support that might be provided by a support person include, but are not limited to, the following:

- physically transferring an individual from one location to another;
- assisting a person with eating or with using the washroom;
- monitoring an individual's health or being available to provide support in the event of an episode such as a seizure.

5.8 Service Disruptions

If there is a temporary disruption in any of our services either in whole or in part, the YMCA HBB will provide notice of the disruption to the public via as many channels as possible, in accessible formats, where available. We will physically post notices where the disruption is taking place as well as through any other channels that are appropriate such as email, phone, text, social media, or on our website.

Notice of the disruption will include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

5.9 Feedback Process

The YMCA HBB will accept feedback about the way in which it provides goods and services to persons with disabilities by in person, by phone or email, or in another way that is suitable to a person with a disability.

When a complaint is received about the way we provide goods, services, or facilities to persons with disabilities, the YMCA HBB will let the person who submitted the feedback know about the actions the organization will take to resolve the issue. Feedback will be reviewed and considered with a view to determining whether changes to the way the YMCA HBB provides programs or services to persons with disabilities are required or appropriate.

Feedback pertaining to this Policy or its implementation may be submitted:

- **In Person Attention:** Senior Vice-President People, Leadership and Culture Department
- **Mail:** People Leadership and Culture
79 James Street South
Hamilton, Ontario
L8P 2Z1
- **Email:** plc@ymcahbb.ca

5.10 Transportation

The YMCA HBB does not provide conventional or specialized commercial transportation services to passengers and is not required to adhere to the Transportation Standard.

5.11 Design of Public Spaces

If the YMCA HBB redesigns or redevelops an outdoor public space such as a parking area, outdoor eating area or play space, exterior path of travel, recreational trail, or beach access route, or an indoor or outdoor service counter, waiting area or queuing line, it will do so in accordance the Design of Public Spaces Standard of the AODA. The YMCA HBB will also ensure any newly redesigned or redeveloped areas are maintained in accordance with the rules set out by the AODA.

6. RELATED POLICIES OR REFERENCES

- Accessibility for Ontarians with Disabilities Act, S.O. 2005
- Workplace Health & Safety Policy
- Ontario Human Rights Code (OHRC)
- YMCA HBB Accommodation Procedure

7. COMMUNICATION AND IMPLEMENTATION

- 7.1. This policy will be communicated to all YMCA Hamilton|Burlington|Brantford staff in accordance with the YMCA HBB Policy Development and Review Cycle.
- 7.2. The policy will be shared through appropriate internal/external channels, including the MyHBB intranet and other internal communications as required to support awareness and understanding.
- 7.3. Questions about this policy may be directed to the Policy Owner.

8. REVIEW/REVISION HISTORY

Date	Revision No.	Revision Type	Reference Section(s)
July 2026	2.0	Updated Policy	- Updated policy to new template - Updated language
June 2025	1.0	Updated Policy	

9. DOCUMENT CONTROL

This document is for internal use only at YMCA of Hamilton|Burlington|Brantford (YMCA HBB).

YMCA HBB accepts no responsibility for use of this material by individuals or organizations outside of YMCA HBB.

Printed copies of this document are considered uncontrolled and may not reflect the most current version. The official version of this policy is maintained electronically on [MyHBB Policies](#) and should be consulted prior to use.