



**Umbrella Family and  
Child Centres of Hamilton**

<b>Manual</b>	Human Resources Policies & Procedures
<b>Section</b>	8 – Accessibility
<b>Policy</b>	8.1 – Accessibility for Ontarians with Disabilities Act (AODA)
<b>Last Reviewed</b>	December 2024

## **POLICY**

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UFCC is committed to meeting the accessibility needs of people with disabilities in a timely manner and providing a barrier-free environment for our employees, volunteers, job applicants, customers and visitors who enter our premises and access our information/services. We are committed to treating all people in a way that allows them to maintain their dignity and independence and provides the same opportunity to access and benefit from our programs and services as other service users. We are committed to ensuring our organization's compliance with accessibility legislation by incorporating accessibility considerations into policies, procedures, equipment requirements, training for employees and volunteers.

### Procurement Policy

UFCC will incorporate accessibility criteria and features when procuring or acquiring goods, service or facilities. The only exception is in cases where it is impracticable to do so. Where it is deemed impracticable to do so, an explanation shall be provided, upon request.

### Training

UFCC will provide initial and ongoing training to all employees and volunteers regarding the Accessibility for Ontarians with Disabilities Act and on the Human Rights Code, as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees and other staff members. A record of all training offered will be maintained.

Training will include:

- (i) An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- (ii) UFCC's Multi-Year Accessibility Plan.
- (iii) How to interact and communicate with people with various types of disabilities.
- (iv) How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- (v) What to do if a person with a disability is having difficulty accessing UFCC's services.
- (vi) A quiz to ensure that the material has been understood.



[Information and Communications Standard](#)

[Feedback](#)

UFCC welcomes any feedback, complaints or questions regarding the methods it uses to provide services to persons with disabilities. UFCC is committed to ensuring that its feedback process is accessible, either upon design or request. Individuals may provide their feedback, complaints or questions in person, by telephone, in writing, or by email to the Human Resources Department at:

<b>Telephone</b>	(905) 312-9836
<b>Fax</b>	(905) 312-8738
<b>Email</b>	info@umbrellafamily.com
<b>Mail</b>	Umbrella Family and Child Centres of Hamilton Suite 302, 1550 Upper James Street, Hamilton ON L9B 2L6

Feedback forms are available on our website or at any location where UFCC offers service.

Every question or complaint will be reviewed and responded to within three (3) business days after receipt of the feedback form. Where possible, any issues raised will be addressed. If an issue cannot be addressed, the complainant will be advised, and an explanation provided.

[Accessible Formats/Communications Supports](#)

UFCC is committed to creating communication systems that take into account people with disabilities. UFCC will provide or arrange for all publicly available information to be in accessible formats. Communication supports for persons with disabilities will be arranged for in a timely manner and at no additional cost to the individual, upon request. UFCC will consult with people with disabilities to determine their information and communication needs and take into account the person’s accessibility needs when customizing individual requests. UFCC will notify the public about the availability of accessible formats and communication supports.

[Emergency Procedure, Plans or Public Safety Information](#)

UFCC is committed to providing its clients with publicly available emergency information in an accessible way upon request. We will also provide employees, students on placement and volunteers with disabilities with individualized emergency response information when necessary and requested.



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### [Accessible Websites and Web Content](#)

UFCC will ensure that our website, and where applicable, web content, conforms to the World Wide Web Content Accessibility Guidelines (WCAG) and will refer to the legislation for specific compliance deadlines and requirements. We have taken reasonable steps to ensure that our website is WCAG 2.0 Level A and WCAG 2.0 Level AA compliant.

### [Employment Standards](#)

UFCC is committed to providing a working environment that is based on respect for the dignity and rights of its employees. Our goal is to create a workplace that is free from harassment and discrimination and provides fair and inclusive systems and practices. As such, we will take all reasonable steps to prevent and remove accessibility barriers that are identified.

### [Recruitment, Assessment and Selection](#)

UFCC will make known to the public and its employees that, when requested, we will accommodate individuals with disabilities during the recruitment and assessment period. This will be done when posting job positions and when arranging interviews.

When requested, interviews will include a format that will make the information accessible and easy to understand. UFCC will consult with the applicant and provide support or arrange for suitable accommodation accordingly.

UFCC will also notify all successful applicants of the policies and supports for accommodating people with disabilities in the offer letter, and when they are hired.

### [Accessible Formats and Communications Supports for Employees](#)

UFCC shall inform its employees of policies used to support those employees with disabilities, including but not limited to, the provision of on-the-job accommodations that take into account an employee's accessibility needs due to a disability. Such information will be provided to new employees as soon as practical after they begin their employment and to existing employees whenever there is a change to existing policies on the accessibility needs due to a disability.

If an employee with a disability requests it, UFCC will provide or arrange for the provision of accessible formats and communication supports for information needed in order to perform their job and information that is generally available to all employees in the workplace.

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



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### [Workplace Emergency Response Information](#)

Where required, UFCC will provide a tailored workplace emergency response plan or information for employees with disabilities. The plan 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.

### [Documented Individual Accommodation Plans](#)

UFCC will have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans will include specific elements including:

- (i) the manner in which the employee can participate in the development of the plan;
- (ii) the means by which the employee is assessed on an individual basis;
- (iii) the manner in which an employer can request an evaluation by an outside medical expert, or other experts (at UFCC's expense) to determine if accommodation can be achieved, or how it can be achieved;
- (iv) the steps taken to protect the privacy of the employee's personal information;
- (v) the frequency with which the individual accommodation plan will be reviewed or updated and the manner in which it will be done;
- (vi) if the individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee; and
- (vii) the means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

Individual accommodation plans shall include any information regarding accessible formats and communications supports and any individualized workplace emergency response information to be provided, as agreed to with the employee. Individual accommodation plans shall also identify any other accommodation that is to be provided.

### [Return to Work Process](#)

UFCC will develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability and who require disability-related accommodations in order to return to work. The return-to-work process includes an outline of the steps UFCC will take to facilitate the employee's return to work and use documented individual accommodation plans.



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### [Performance Management](#)

When employing performance management tools to assess and improve employee performance, productivity and effectiveness, UFCC will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

### [Career Development and Advancement](#)

UFCC will respect the accessibility needs of its employees with disabilities when making decisions related to career development and advancement.

### [Redeployment](#)

If UFCC uses redeployment processes, such as reassignment of employees to other departments within the organization as an alternative to a “layoff” when a particular job or department has been eliminated, it will take into account the accessibility needs of its employees with disabilities.

### [Customer Service Standard](#)

#### [Providing Goods, Services or Facilities to People with Disabilities](#)

UFCC is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

UFCC understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

UFCC is committed to complying with both the Ontario Human Rights Code and the AODA. UFCC is committed to excellence in serving all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

### [Assistive Devices](#)

People with disabilities may use their personal assistive devices when accessing our services or facilities. Assistive devices include products such as wheelchairs, walkers, canes and electronic communication devices.

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 services or facilities.



We will ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our services or facilities.

### Communication

We will communicate with people with disabilities in ways that take into account their disability. This may include face to face communication, phone conversations and electronic means. Clients will be offered communication with UFCC by e-mail or Bell Relay Service (1-800-855-0511) if telephone communication is not suitable to their communication needs or is not available. We will work with the person with a disability to determine what method of communication works for them.

### Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

A service animal can usually 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, our staff may ask a person to provide documentation that confirms the person needs the service animal for reasons relating to their disability. A regulated health professional could be a physician, nurse, psychotherapist, audiologist, chiropractor, optometrist, physiotherapist, or occupational therapist.

All service animals must have proof of inoculations/vaccinations required under the Early Years and Child Care Act (2014).

If service animals are prohibited by another law, we will explain why the animal is excluded and discuss with the person with a disability another way of providing services or access to our facilities. Examples include the Ontario Health Protection and Promotion Act (HPPA) or the Ontario Food Safety and Quality Act, which prohibits service animals in places where food is prepared, processed or handled. This Act would prohibit the presence of a service animal in the kitchen of any childcare facility we operate.

Where a service animal is not allowed by law, alternative options will be explored to provide the service to the person with a disability.

Where there is a risk to the health and safety of another person as a result of the presence of a service animal, consideration must be given to options available prior to the exclusion of a service animal. An example would be a situation where an individual has a severe allergy to the service animal. It is our expectation that the situation be fully analyzed, and all measures taken to eliminate the risk and accommodate both persons; and making reasonable alterations to schedules.



### Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

In certain cases, UFCC might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability or others on the premises. Before making a decision, UFCC will consult with the person with a disability to understand their needs, consider health or safety reasons based on available evidence and determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

The support person will be required to comply with all health and safety regulations and UFCC policies pertaining to adults who have contact with the children in our care. These will be made clear to the support person prior to their participating in our programs.

### Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, UFCC will notify customers as promptly as possible. The notice will be posted at the entrance of the applicable centre, as well as being provided verbally, electronically or in person if applicable. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

UFCC will notify clients if there is a planned or unexpected disruption of a facility or service persons. Examples of disruptions could include snow days due to inclement weather, school lock downs. The notice will include the following information:

- (i) All notices of temporary disruptions will be posted on UFCC's website, voicemail, and all staff affected will receive notice from another UFCC staff member.
- (ii) All UFCC programs operate in Hamilton Wentworth District School Board (HWDSB) schools. When the school board makes a decision to close schools for the day due to a snowstorm or snow emergency, UFCC programs are also canceled. Notice of school closures are given on the radio (CHML or K-Lite FM) or CHCH television. There is usually information about snow closures posted on the HWDSB website, as well.

### Notice of Availability of Documents

UFCC will notify the public that documents related to accessible customer service, are available upon request by posting a notice on our website. UFCC will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.



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[Modifications to This or Other Policies](#)

Any policies of UFCC that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

**Policy Attachments:** N/A

**REVISION HISTORY**

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Revision	Date	Description of Changes	Requested By
0.0	03/30/2021	Reviewed by Courtney Robertson, Director of Human Resources	
1.0	03/30/2021	Policy Format Updated	
2.0	12/01/2024	Head office address updated by Lynne Berwick, Human Resources Manager	



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<b>Manual</b>	Human Resources Policies & Procedures
<b>Section</b>	8 – Accessibility
<b>Policy</b>	8.2 – Multi-Year Accessibility Plan
<b>Last Reviewed</b>	March 2021

## **POLICY**

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Umbrella Family shall create a multi-year Accessibility Plan outlining a phased-in approach to prevent and remove barriers and address the current and future requirements of the AODA. The plan shall be reviewed and updated at least every five (5) years as required.

## **PROCEDURES**

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1. The Manager of Human Resources, in collaboration with the senior management team, will develop an Accessibility Plan and review a minimum of once every five (5) years.
2. The Designated Supervisor will review the Accessibility Plan with employees as part of their orientation.

**Policy Attachments:** Multi-Year Accessibility Plan

## **REVISION HISTORY**

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<b>Revision</b>	<b>Date</b>	<b>Description of Changes</b>	<b>Requested By</b>
0.0	03/30/2021	Reviewed by Courtney Robertson, Director of Human Resources	
1.0	03/30/2021	Policy Format Updated	
2.0	12/01/2024	Titles Updated	



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<b>Manual</b>	Human Resources Policies & Procedures
<b>Section</b>	8 – Accessibility
<b>Policy</b>	8.3 – Individual Accommodation Plan
<b>Last Reviewed</b>	August 2025

## **POLICY**

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Umbrella Family, in accordance with its responsibilities under the Accessibility for Ontarians with Disability Act (AODA) and the Human Rights Code of the Province of Ontario, will proactively seek to reasonably accommodate employees, volunteers and placement students with a disability. Umbrella Family is committed to removing barriers that limit, restrict or prevent individuals with a disability to fully participate in the workplace. Umbrella Family has adopted a process and plan to provide individualized accommodation for employees, volunteers and placement students, when required.

Umbrella Family shall notify internal and external job applicants about the availability of accommodations upon request for applicants with disabilities. This may take the form of a notice posted to the website of the organization or a statement on a job posting for which “accommodation for applicants with disabilities is available upon request.” In addition, job applicants who have been selected to participate in an assessment or selection process shall be notified that accommodations are available. The related materials or processes required specific to the job applicant’s disability shall be discussed in consultation with the applicant.

Umbrella Family defines reasonable accommodation as the removal or alleviation of barriers in the workplace to enable the participation of a person with a disability. Workplace accommodations can range in their complexity and costs.

Umbrella Family will notify all employees, volunteers and placement students of the availability of an individualized accommodation. A request by an employee, volunteer or placement student for a workplace accommodation for a disability will be considered on a case-by-case basis. The commitment by Umbrella Family to inclusion and equity will guide the dialogue and actions of the organization. Umbrella Family recognizes that workplace accommodation is a partnership with the involved employee, volunteer or placement student. The final decision regarding an accommodation request will be determined by Umbrella Family. If an employee, volunteer or placement student is dissatisfied with the result, a review can be requested.



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## **PROCEDURES**

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### **A. Accommodation Request**

1. An employee, volunteer or placement student with a disability will notify their Designated Supervisor that an individual accommodation is required because essential responsibilities and duties cannot be performed. A Designated Supervisor can also identify a situation where an individual accommodation may be warranted.
2. The employee or volunteer and Designated Supervisor determine the medical and/or other assessments required to better assess the limitation or barrier and determine the accommodation.
3. The Designated Supervisor then formally requests in writing the medical and/or any other information that is required. In many cases, the Designated Supervisor may request the completion of a Functional Abilities Form (FAF) be completed by the employee's treating physician (or medical professional). If this request does not provide sufficient information, then Umbrella Family may request the employee and volunteer undergo an independent medical, functional and/or related assessment arranged for by Umbrella Family.
4. The Designated Supervisor in collaboration with their Manager, the Human Resources Manager and the employee and volunteer, will review the information compiled and identify the accommodation to be provided.

### **B. Accommodation Process**

5. The Designated Supervisor in collaboration with the Human Resources Manager and the employee and volunteer will schedule a meeting to develop an Individual Accommodation Plan.
6. In developing the Individual Accommodation Plan, the Designated Supervisor, Human Resources Manager and employee and volunteer will determine if an emergency response is to be addressed in the plan.
7. The Human Resources Manager will ultimately approve the Individual Accommodation Plan.
8. The Designated Supervisor will conduct ongoing monitoring and reassessment of the accommodation at regular or agreed upon intervals.
9. The employee and volunteer may request that an Individual Accommodation Plan be reviewed if there is a change in duties and/or work location.

### **C. Denial of Individual Accommodation Request**

10. The Designated Supervisor in collaboration with the Manager of Human Resources will have the authority to deny an accommodation request. If a request is denied, then the reasons will be shared with the employee and volunteer in an accessible format.

**Policy Attachments:** N/A



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## REVISION HISTORY

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Revision	Date	Description of Changes	Requested By
0.0	03/30/2021	Reviewed by Courtney Robertson, Director of Human Resources	
1.0	03/30/2021	Policy Format Updated	
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