

**Accessibility for Ontarians with Disabilities Act (AODA)
Integrated Accessibility Standards Regulation (IASR)****Table of Contents**

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Statement of Purpose

This policy is intended to provide the overarching framework to guide the review and development of NCU policies, standards, procedures and guidelines to comply with the Integrated Accessibility Standards, Ontario Regulation 191/11, under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Statement of Organizational Commitment

NCU is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities benefit from the same services, in the same place and in a similar way as others.

NCU is committed to ensuring that every employee and member receives equitable treatment with respect to employment and services, without discrimination, and receives accommodation where required, in accordance with the provisions of the Ontario Human Rights Code and the AODA and its Regulations. NCU will meet the accessibility needs of persons with disabilities in a timely manner.

General Requirements

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation (not applicable to NCU), design of public spaces, and customer service) are outlined as follows.

Establishment of Accessibility Policies and Plans

Northern Credit Union will:

- develop, implement and maintain policies governing how it will achieve accessibility through these requirements.
- include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.
- establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR.
- accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.
- review and update its accessibility plan once every five (5) years.

Procuring or Acquiring Goods and Services, or Facilities

Northern Credit Union will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements

Northern Credit Union will provide training for its employees and volunteers regarding the AODA/IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to

individuals who are responsible for developing Northern Credit Union's policies, and all other persons who provide goods, services or facilities on behalf of Northern Credit Union.

Training will be provided as soon as is reasonably practicable, but no later than 30 days after hire date. Training will be provided on an ongoing basis to new employees and as changes to Northern Credit Union's accessibility policies occur.

Records

Northern Credit Union will maintain records on the training provided, when it was provided and the number of employees that were trained.

Self-Serve Kiosks

Northern Credit Union will incorporate accessibility features when designing, procuring or acquiring self-service kiosks. Northern Credit Union will always be aware of the accessibility features of self-service kiosks for persons with disabilities.

Policy Application

This policy applies to all individuals entitled to the protection set out in the AODA and its regulations, including members or customers and employees of NCU.

Member/Customer Service Policy

Intent

All goods and services provided by Northern Credit Union will follow the principles of dignity, independence, integration and equal opportunity. Northern Credit Union will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with these principles by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a health and safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual accommodation needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

1. Northern Credit Union is committed to excellence in serving all Members, Employees and the General Public including people with disabilities and we will carry out our functions and responsibilities in the following areas:

General Services - We will provide service, forms, policies, billing, statements etc. in an alternate format upon request so that there is full access to all of our products and services. This may include but is not limited to; hard copy, large print email or other modified methods.

Assistive Devices - We will ensure that our staff are trained and familiar with various assistive devices that may be used by persons with disabilities while accessing our goods or services.

Communication - Northern Credit Union staff will communicate with people with disabilities in ways that take into account their disability.

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. While conducting business, it is the responsibility of the person with a service animal to control the animal at all times. We will respect service animals and not touch, or in any way distract them without first obtaining permission.

Support Persons - We are committed to welcoming people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises. We will obtain consent from the person with a disability, where necessary to discuss confidential matters in the presence of the support worker. See attached form "AODA Consent to disclose Personal Financial Information. Fees will not be charged for support persons.

Notice of Temporary Disruption - Northern Credit Union will provide members with as much notice as possible in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This 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.

The notice will be placed at public entrances where the disruption is to occur and on our official web site – northerncu.com

2. Training for Staff - Northern Credit Union will provide training to all employees, as well as volunteers or others who deal with the public or other third parties on our behalf. This training will be provided as part of initial orientation to employment with Northern Credit Union and all new employees will be provided with and are expected to complete AODA training within the first 30 days of employment. This training will include:

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- A review of the requirements of the customer service standards;
- 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 or other service animal; or
 - Require the use of a support person;
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

3. Feedback process - The ultimate goal of Northern Credit Union is to meet and surpass Member and Employee expectations while serving members with disabilities. Comments on our services regarding how well these expectations are being met are welcomed and appreciated.

Feedback on the way Northern Credit Union provides goods and services to people with disabilities may be made by contacting Northern Credit Union verbally, via regular mail, via our website [Northern Credit Union's Web Site - Feedback Form](#). All feedback will be directed to the Director of Compliance & Risk Management (Complaint's Officer). The requestor can expect to hear back within five (5) business days. Complaints will be addressed according to our organization's regular complaint management procedures.

Modifications - We are committed to developing policies that respect and promote the dignity and independence of all people, including those with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of Northern Credit Union that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Questions about this Policy - This policy exists to achieve service excellence to members with disabilities. If anyone has a question about the policy, or if the purpose of this policy is not understood, an explanation will be provided by the Human Resources department – human.resources@northerncu.com.

Employment Policy

Intent

This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Northern Credit Union shall follow the principles of dignity, independence, integration and equal opportunity.

General Principles

A. General Requirements – as outlined above.

B. Recruitment, Assessment and Selection

Northern Credit Union will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Northern Credit Union will consult with the applicant and provide or arrange for suitable accommodation.

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

C. Accessible Formats and Communication Supports for Employees

Northern Credit Union 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, Northern Credit Union will provide or arrange for the provision of accessible formats and communication supports for the following:

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

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

D. Workplace Emergency Response Information

Northern Credit Union will create individual workplace emergency response information for employees with disabilities, as requested by the employee. The onus is on the employee to advise their leader/HR of their specific emergency response accommodation needs. 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.

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
- Northern Credit Union reviews general emergency response policies.

E. Documented Individual Accommodation Plans

Northern Credit Union must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:

- Include information regarding accessible formats and communication supports upon request;

- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

F. Performance Management and Career Development and Advancement

Northern Credit Union 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.

G. Return to Work

Northern Credit Union will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Northern Credit Union will take to facilitate the employee's return to work and shall use documented individual accommodation plans.

H. Redeployment

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.

Design of Public Spaces Policy

Intent

This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Design of Public Spaces Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005. This policy applies to removing barriers in two (2) areas:

- Buildings; and
- Public spaces.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements – as outlined above.
- B. Exterior Paths of Travel
- C. Off-Street Accessible Public Parking
- D. Obtaining Services
- E. Maintenance
- F. Exceptions
- G. Review

A. General Requirements – as outlined above.

B. Exterior Paths of Travel

To ensure the health and safety of all pedestrians, any newly constructed or redeveloped exterior paths of travel will meet, and where possible exceed, the technical requirements of the *Integrated Accessibility Standards*, [section 80.23](#), and where applicable, sections 80.24 – 80.28.

C. Off-Street Accessible Public Parking

Types of Spaces and Access Aisles

Northern Credit Union will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities:

- Type A – Parking space with a minimum width of 3.4 m; and
- Type B – Standard parking space with a minimum width of 2.4 mm.

Access aisles will be provided for all accessible parking spaces and will meet the requirements of the *Integrated Accessibility Standards*, [section 80.35](#).

Minimums

Northern Credit Union will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the *Integrated Accessibility Standards*, [section 80.36](#).

Signage

Northern Credit Union will ensure that the proper signage is provided for each accessible parking space. Type A parking spaces will have signage indicating van accessibility.

D. Obtaining Services

Service Counters

When constructing or replacing any service counters, Northern Credit Union will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, [section 80.41](#).

Fixed Queuing Guides

When constructing new fixed queuing guides, Northern Credit Union will ensure that they are made accessible to people with various disabilities in accordance with the *Integrated Accessibility Standards*, [section 80.42](#).

Waiting Areas

When constructing or redeveloping an existing waiting area, Northern Credit Union will ensure that a minimum of 3% of the seating is made accessible. Northern Credit Union will ensure that there will be at least one (1) accessible seat.

E. Maintenance

Northern Credit Union shall ensure that our multi-year accessibility plan addresses:

- Preventive and emergency maintenance procedures for the accessible elements in public spaces; and
- Procedures for temporary disruptions to accessible elements.

F. Exceptions

There may be times where it is not possible for Northern Credit Union to meet all technical requirements as outlined within legislation. In these instances, Northern Credit Union will strive to meet the requirements to the fullest extent to allow for accessible use with particular constraints as addressed in legislation.

G. Review

This policy will be reviewed regularly to ensure that it is reflective of Northern Credit Union's current practices as well as legislative requirements.

Information and Communications Policy

NCU has applied for an extension to comply with new website requirements under the AODA.

Intent

This policy applies to the provision of information and communications services and materials for people with disabilities.

All information and communications materials and services provided by Northern Credit Union shall follow the principles of dignity, independence, integration and equal opportunity.

General Principles

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

- A. General Requirements – as outlined above.
- B. Feedback Process
- C. Accessible Formats and Communication Supports
- D. Emergency Procedures, Plans or Public Safety Information
- E. Accessible Websites and Web Content
- F. Exceptions
- G. Review

A. General Requirements – as outlined above.

B. Feedback Process

Northern Credit Union will ensure that all feedback processes (both internal and external) are made accessible to members or employees, upon request.

In accordance with member service standards, Northern Credit Union will make known the availability of accessible feedback formats.

C. Accessible Formats and Communication Supports

Unless deemed unconvertible, Northern Credit Union 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.

Northern Credit Union 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.

Northern Credit Union will make the availability of accessible formats and communication supports publicly known.

D. Emergency Procedures, Plans or Public Safety Information

Northern Credit Union will ensure that all publicly available safety and emergency information (e.g. evacuation procedures, floor plans etc.) is provided in an accessible format or with appropriate communication supports, upon request.

E. Accessible Websites and Web Content

Northern Credit Union 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.

F. Exceptions

The Information and Communications Standard does not apply to:

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

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Northern Credit Union will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Northern Credit Union 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.

G. Review

This policy will be reviewed regularly to ensure that it is reflective of Northern Credit Union's current practices and legislative requirements.

Definitions

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, 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.

Conversion Ready– An electronic or digital format that facilitates conversion into an acceptable format.

Environmental Mitigation – Activities that are intended to address any negative effects on the environment caused by the standard.

Environmental Restoration – Activities that will benefit the environment.

Exterior Paths of Travel – Refers to sidewalks and walkways designed and constructed for pedestrian travel and intended to provide a functional route from Point A to Point B, rather than a recreational experience.

Kiosk – An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – 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.

Redeveloped – A planned significant alteration to a public space. It does not include maintenance activities, environmental mitigation or environmental restoration.

Consent to Disclose Personal Financial Information - Support Worker – Form

Accessibility for Ontarians with Disabilities (AODA)

I, _____, authorize – Northern Credit Union Limited
(Print your name)

to discuss / disclose during my appointment at the branch:

my personal financial information consisting of:

(Describe the personal financial information to be disclosed)

To: _____
(Print name and address of the support person)

This form is being completed as a result of my request to have my support person attend my appointment where we will be discussing my confidential personal financial information.

I understand that I can refuse to sign this consent form. If I do not sign this consent my personal support worker will not be allowed to attend the office with me when my personal financial information is being discussed.

My Name: _____ Address: _____

Home Tel.: _____ Work Tel.: _____

Signature: _____ Date: _____

Witness Name: _____ Address: _____

Home Tel.: _____ Work Tel.: _____

Signature: _____ Date: _____