



Pathways Health Centre for Children

Accessibility for Ontarians with Disabilities Act (AODA)

ACCESSIBILITY POLICY & Multi-Year Accessibility Plan

Reviewed annually by: HEALTH, SAFETY & RISK COMMITTEE

Revision Dates:

November 17, 2025			

Approved by: 
Chief Executive Officer



ACCESSIBILITY POLICY & PLAN

BACKGROUND

The Government of Ontario enacted the Accessibility for Ontarians with Disabilities Act (AODA) in 2005. This act lays the framework for the development of province-wide mandatory standards on accessibility in all areas of daily life.

Ontario has accessibility standards in five areas:

- i. Customer Service
- ii. Employment
- iii. Information and Communications
- iv. Transportation
- v. Design of Public Spaces

These additional provincial laws and regulations shape our Accessibility Plan:

- The 2001 Ontarians with Disabilities Act (ODA)
- Accessibility Standards for Customer Service (Regulation 429/07)
- The AODA Integrated Accessibility Standard Regulation (IASR)

The AODA has identified five types of barriers:

- i. Attitudinal
- ii. Architectural/ physical
- iii. Technological
- iv. Informational/ communication
- v. Policies/ procedures

The following tools and supports are used to shape the Pathways Accessibility Plan and maintain compliance with the AODA Standards:

- Feedback from clients, customers, volunteers, staff and community
- The Ontario Government website <https://www.ontario.ca/page/accessibility-in-ontario>
- Consultation with municipal Accessibility Coordinator
- Participation in Sarnia Accessibility Advisory Committee meetings
- Accessibility Compliance Report- Self Assessment Tool (every 3 years)

POLICY

Pathways Health Centre for Children is committed to providing accessible services, in a timely manner, and to reducing barriers and increasing accessibility to ensure that persons with disabilities have genuine, open and unhindered access to services, facilities, employment, buildings, and premises. Accessibility will be achieved in a way that takes into consideration the accessibility needs of the individual, based on the type of disability, and allows individuals to



ACCESSIBILITY POLICY & PLAN

maintain their dignity and independence. Pathways Health Centre for Children is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Pathways will develop and maintain a multi-year accessibility plan which will guide actions to improve accessibility and prevent and remove barriers.

Pathways' Commitment to Accessibility

Pathways Health Centre for Children is committed to:

- monitoring and improving accessibility of Centre facilities and services for clients and their families, staff, students, volunteers, community partners, contractors, visitors and the community of Sarnia-Lambton
- responding to feedback provided by persons with disabilities, addressing these concerns and reflecting the solutions in annual accessibility plans
- ensuring that staff, volunteers, students and others providing services on our behalf have received training and regular updates on the AODA, Human Rights Code, Pathways' accessibility plan, accessible customer service and other relevant areas of the AODA, as needed
- the provision of quality services to all clients and their families, community partners and the community of Sarnia-Lambton
- inclusive and representative hiring practices and responding to requests for accommodation throughout the recruitment process.
- developing accommodation in the workplace plan for employees with temporary or permanent disabilities to support them to perform the essential duties of their position.

Multi-Year Accessibility Plan

Pathways maintains a Multi-Year Accessibility Plan outlining the actions put in place to improve accessibility for individuals with disabilities. The multi-year accessibility plan is updated annually or more often, as required. The plan contains tasks and projects accomplished in previous Pathways Accessibility Plans to enhance accessibility, and new initiatives to be explored during the period of the plan to support compliance of the AODA Integrated Accessibility Standards Regulations. This plan is available on the Pathways website. The multi-year plan will be included as an integral part of this policy (Appendix A). On request, the plan can be provided in alternative formats (e.g., large print (18-point font) at no additional cost to a person with a disability). Feedback, questions or concerns about the plan can be forwarded to the Pathways Accessibility Officer; contact information is located below and on the website.

Identifying Accessibility Needs

Pathways will use the following methods to identify accessibility needs and requirements:

- any current AODA legislation that identifies compliance requirements for the period of the Accessibility Plan
- client, staff, student, volunteer, family and community input
- input from the Pathways Health, Safety and Risk Committee



ACCESSIBILITY POLICY & PLAN

- Accessibility Compliance Report: Self-Assessment Tool

Accessibility Oversight, Review and Monitoring

Pathways accessibility work is integrated into the Health, Safety and Risk Committee with “Accessibility” being a standing agenda item for meeting discussion. When required, Ad Hoc Group meetings are arranged.

The Director of Community Services is the Chair of the Accessibility Ad Hoc Group of the Health, Safety and Risk Committee at Pathways Health Centre for Children. Members of the Pathways Accessibility Ad Hoc Group include, at minimum:

- Director of Community Services (Chair and Pathways Accessibility Officer)
- Chief Executive Officer
- A member of the Leadership Team (as assigned by the CEO)

The Accessibility Ad Hoc Group of the Health, Safety and Risk Committee commits to providing information updates to the Leadership Team and the Health, Safety and Risk Committee as required.

1. Customer Service Standard

To comply with the Customer Service Standard, Pathways 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 customers receive the same value and quality of service;
- allowing persons with disabilities to do things in their own ways, at their own pace when accessing goods and services, if this does not present a safety risk;
- using alternative methods, when possible, to ensure that persons with disabilities have access to the same products and services, in the same place, and in a similar manner as our other customers;
- permitting persons with disabilities to use assistive devices, support persons, and service animals, as required, when accessing goods and services;
- considering individual needs when providing services;
- communicating in a manner that considers the person's disability;
- providing notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities to access Pathways services; and
- implementing a Customer Feedback Process and procedures for follow-up.

a) Assistive Devices

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



ACCESSIBILITY POLICY & PLAN

Pathways has access to trained staff on-site who can assist in this area if a customer identifies that they require support.

Any specialized equipment that enhances accessibility at Pathways (e.g., ceiling lift systems, water wheelchairs, automatic door switches, etc.) are integrated into our annual Preventative Maintenance Plan to ensure they are inspected regularly and, if necessary, repaired/replaced.

b) Communication

We will communicate with people with disabilities in ways that consider their disability. If a customer identifies a barrier to providing or receiving Pathways information, we will work together with them to identify a solution. Customers are encouraged to contact our receptionist, who will direct them to the appropriate staff member for support.

Alternate/accessible formats or communication supports are available upon request, for example: different font size or style, file format for screen reader, verbal review, etc. Anyone who needs assistance with obtaining an alternate format of communication, can contact the Pathways Accessibility Officer. Contact information is listed below and on the website.

c) 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. There are no restrictions on what type of animals can be used as a service animal to support a person with a disability.

Section 4(9) of the Accessibility Standards on Customer Service indicates that an animal is a service animal if (1) it is readily apparent that the animal is being used for reasons related to a person's disability; or (2) if the person provides a letter from a regulated health professional confirming that the animal is required for reasons relating to the disability.

d) Support Persons

A person with a disability, when accompanied by a support person, is welcome to have that person accompany them on our premises. If the support person is providing one-on-one support to the individual while involved in a program at Pathways, Pathways has the right to ask the support person for proof of their qualifications and can require the support person to meet a minimum standard of qualifications, as appropriate and specific to the requirements of the program. e.g. A support person who accompanies a client one-on-one during a program at Pathways may be required to have one or more of the following:

- Recent Vulnerable Sector Police Check
- Health Screening



ACCESSIBILITY POLICY & PLAN

- AODA Customer Service Training
- Additional orientation training, as it relates to the specific program

Fees will not be charged for support persons for admission to any Pathways' programs, when they are accompanying and supporting someone with a disability. We notify clients/families of this through our program registration process.

e) Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers or clients with disabilities, Pathways will promptly notify customers/clients/families.

This includes:

- Disruption in all client service areas
- Disruption in aquatic services
- Centre closure due to inclement weather or emergencies

Customers/clients /families will be informed by phone, or by way of our website <http://www.pathwayscentre.org> and/or social media platforms. If appropriate, notifications will be posted at customer service locations and will be visible and in a location pertaining to the disruption such as a window, wall or door. If the Centre is closed due to inclement weather, customers, clients/families can check our website, our Facebook/Instagram, or inquire by calling Pathways and listening to our automated voicemail message, which may include information about the reason for the disruption, the anticipated length of time, and a description of alternative facilities or services, if available. There may be times that unexpected service disruptions occur and advance notice could not be provided. In these situations, Pathways will provide notification as quickly as possible in the method(s) most appropriate based on the circumstances.

f) Training

Pathways provides AODA and Ontario Human Rights training to all employees, students, volunteers and those providing services on behalf of the organization. Customer Service training is a mandatory part of our orientation process. The Pathways Accessibility Officer is connected to the City of Sarnia's Accessibility Advisory Committee (SAAC) to support Pathways' ongoing compliance with AODA legislation and to ensure that the needs of Pathways clients are addressed in the community.

Every Pathways employee, student, volunteer and third-party personnel who provide services on behalf of Pathways receives information/ training that includes:

- An overview of the Accessibility for Ontarians with Disabilities Act (AODA), 2005 and the requirements of the customer service standard
- Human Rights Code
- Pathways Accessibility Policy and Multi-Year Accessibility Plan, as appropriate

Additional role-related training may also include:

- How to interact and communicate with people with various types of abilities



ACCESSIBILITY POLICY & PLAN

- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing Pathways goods and services
- Staff, students and others who use equipment such as the ceiling track lift systems, are provided with specific training on how to use this equipment.

Revisions to this information are communicated internally through email, at staff meetings and accessible on PolicyTech.

Human Resources will maintain a record of training that includes names and dates.

g) Customer Feedback/ Complaints Process

Pathways welcomes feedback, both comments and complaints, from our customers/clients/families. We encourage all customers/clients/families to address any complaints directly with the staff member providing the service. If the complaint is not fully addressed to satisfaction or if an individual would prefer to speak directly to a Supervisor, Director or the Chief Executive Officer, they are encouraged to complete the [on-line form](#) or call (519) 542-3471 extension 1297. The [on-line](#) form can be accessed from our website at: <https://www.pathwayscentre.org/contact/>.

Pathways' Family Engagement Coordinator is also available to provide support to parents/ caregivers of clients receiving services regarding the complaint process at Pathways. The Family Engagement Coordinator will explain all options regarding their individual situation. The Family Engagement Coordinator can be contacted through Pathways' reception. Complaints will be addressed according to Pathways' regular complaints procedures.

h) Emergency Situations

Staff are trained on emergency procedures and how to assist those who may require help during an emergency.

2. Information and Communications Standard

Pathways will ensure that our process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request. Pathways shall provide or arrange, upon request, for the provision of accessible formats and communication supports for persons with disabilities, in a timely manner, that considers the person's accessibility needs due to disability, and at a cost that is no more than the regular cost charged to other persons.



ACCESSIBILITY POLICY & PLAN

a) Notice of Availability and Format of Documents

Notice is posted on Pathways website which states the following:

“We will work to accommodate, when requested, accessibility needs that individuals may have when engaging in Pathways services and/or information. Please let us know how we can help.

We also welcome all feedback, comments and concerns regarding the accessibility of our sites and services. Contact our Accessibility Officer, 519-542-3471 ext. 1262 or inquiries can also be made through our Contact Us page.”

b) Accessible Websites and Web Content

Pathways' website and all web content conform with the Worldwide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level A and Level AA.

3. Employment Standard

Pathways Health Centre for Children is committed to accessible employment practices for potential and current employees with disabilities as outlined in the AODA and Human Rights Code.

Refer to Pathways policies for details:

- [Accommodation in the Workplace](#)
- [Recruitment and Onboarding](#)
- [Equity, Diversity and Inclusion](#)

4. Transportation Standard

This standard does not apply to Pathways.

5. Design of Public Spaces Standard

Pathways, being a non-profit organization with more than 50 employees, is committed to making new or significantly renovated public spaces accessible as outlined in the AODA. The Design of Public Spaces Standard includes guidelines for service-related elements like service counters, fixed queuing lines, parking and waiting areas with fixed seating. Pathways will ensure that accessibility is discussed with the appropriate contractors. Whenever possible, Pathways will proactively engage with clients/ families and employees regarding the design of public spaces.



ACCESSIBILITY POLICY & PLAN

For further details about our plan or if you have any questions or concerns about accessibility issues at Pathways Health Centre for Children, please contact:

Pathways Accessibility Officer
(519) 542-3471 extension 1262
kmclintock@pathwayscentre.org

Related Documents:

- [Multi-Year Accessibility Plan 2026-2028 - Appendix A to Accessibility Policy & Plan](#)
- [Notice of Temporary Disruption of Service - FORM](#)
- [Individualized Accommodation Plans for Emergencies](#)
- [Complaints](#)
- [Access to Inclusive Services](#)

Resources:

- [Accessible Fundraising Events Guide](#)
- [Accessible Events Checklist](#)
- [Tips for Serving Customers with Disabilities](#)
- [Guide to Accessible Documents](#)