

Accessibilty Policy for the

Accessibility for Ontarians with Disabilities Act, 2005 ("AODA")

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Table of Contents

1. General Accessibility Policies	
1.2 Accessibility Pledge	6
1.3 Application of Policies	
2. Customer Service Standard Policies	8
2.1 Definitions	8
2.2 Provision of Services	11
2.3 Service Animals	11
2.4 Support people	12
2.5 Assistive Devices	12
2.6 Notice of temporary service disruption	12
2.7 Documentation of Accessible Customer Service	13
2.8 Training for staff, students, and volunteers	13
2.9 Making a Complaint	13
3. Integrated Accessibility Standards Policy	15
Policies on Employment and	15
Information and Communication	15
3.2 Information and Communications Standards	17
3.3 Employment Standards	18
Appendices	21
Appendix 1: Alternate Formats for this policy	21
Appendix 2: Training Plan	
Appendix 3: Complaints Process	23

1. General Accessibility Policies

Policy Objectives

The goal of this policy is to ensure that Carlington Community Health Centre meets or exceeds the standards set by the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") and its regulations.

Statement of Commitment

Carlington Community Health Centre ("CCHC") is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

Carlington welcomes and encourages people with disabilities to use programs and services. CCHC will provide access to programs and services for people with disabilities in a way that respects their rights to dignity, independence, and integration.

This commitment is consistent with CCHC's mission to deliver services in a welcoming and supportive environment and with CCHC's core value of equity; accessibility, diversity and fairness in the treatment of all individuals.

CCHC will establish policies, practices and procedures which support the accessibility standards established under the AODA on customer service, information and communication, employment and the built environment.

Scope

These policies apply to the delivery of operations, services and programs provided by CCHC and to the engagement of staff, students, and volunteers.

Accessibility Plan

CCHC will develop, maintain, and document an Accessibility Plan outlining our strategy to prevent and remove barriers from our program and service locations and to meet our requirements under the legislation.

Status updates on the Plan will be provided annually and posted on our web site. Upon request, CCHC will provide a copy of the Accessibility Plan in an accessible format.

The Accessibility Plan will be reviewed and updated in consultation with persons with disabilities at least once every five years and will be posted on our web site. Upon request, CCHC will provide a copy of the Accessibility Plan in an accessible format.

Accountability

The Board of Directors and everyone with a management function at CCHC is accountable to our clients, employees, staff, and volunteer, and to the government of Ontario for meeting the standards set by the Accessibility for <u>Ontarians with Disabilities Act, 2005 ("AODA")</u> and its regulations. If you have any concerns regarding this policy please contact the Executive Director at 613-722-4000.

1.1 Accessibility Principles

Dignity – service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people. People with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience.

Independence – service is provided in a way that allows the person with a disability to do things on their own without unnecessary help, or interference from others.

Integration – service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable the person to access goods or services.

Equal opportunity – people with disabilities have an opportunity equal to that given to others to access our goods or services.

1.2 Accessibility Pledge

Carlington Community Health Centre (CCHC) welcomes and encourages people living with disabilities to use our services. CCHC will provide access to our services for people with disabilities in a way that respects their right to dignity, independence, and integration.

CCHC strives to provide service to everyone in a welcoming and supportive environment. CCHC will consider the individual needs of people with disabilities in delivering service by:

- Considering individual and special needs when applying existing CCHC policies
- Communicating with people in a way that meets their needs
- Welcoming feedback and suggestions about services in a variety of formats
- Welcoming accompanying support people
- Offering a range of assistive devices
- Welcoming service animals
- Letting people know if services are not available where possible, for example, if a program is going to be closed or if the website is not available
- Ensuring emergency responses address accessibility
- Training staff and volunteers to provide the best possible service
- Providing a forum for addressing concerns or challenges associated with accessing our services including phone number and key contact information
- Providing opportunities for continuous improvement and regular review of accessibility policies and procedures

1.3 Application of Policies

Program Policies

Program policies will be applied in a way that considers the needs of people with disabilities and respects the principles of dignity, independence and integration.

Communication

CCHC staff, students, and volunteers will communicate with people with disabilities in a way that takes their needs into consideration.

Feedback process

CCHC welcomes client feedback and makes information available to all clients on how to provide feedback. Feedback is accepted by CCHC in a variety of formats. Assistance is available to support all clients, including people with disabilities, in providing feedback.

Requests for Accommodation under the *Ontario Human Rights Code*

CCHC will continue to meet the standards set by the Ontario ("Code"). Where request Human Rights Code a accommodation is made, CCHC will strive provide to accommodation in a way that most respects the dignity of the person. CCHC recognizes that people with disabilities may require individualized accommodation and that each person's needs are Accommodation provided will be unless experiences "undue hardship" as defined in the Code.

2. Customer Service Standard Policies

The following directives address the requirements established by the Accessibility Standards for Customer Service, Ontario Regulation 429/07 ("Customer Service Standard").

2.1 Definitions

Assistive Device

An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities such as moving, communicating or lifting (examples include, walkers, magnifiers for reading, etc...).

Barrier

A barrier as any policy, practice or procedure, or part of the built environment that prevents someone with a disability from participating fully in CCHC programs or services because of his or her disability.

Disability

CCHC uses the definition of disability in the AODA. A disability can include: a) physical disability, infirmity, malformation or disfigurement, b) mental impairment or developmental disability, c) learning disability, d) mental disorder, and e) an injury or disability for which government benefits are received.

Reasonable Efforts

The Customer Service Standard requires organizations to make reasonable efforts to meet the needs of people with disabilities. CCHC defines reasonable efforts as providing the best possible service within the context of: available resources, balancing the needs of people with disabilities with others who may encounter barriers to access and with the community at large, the health and safety of CCHC staff, students, and volunteers, the security of CCHC property, and existing laws and contracts.

Alternate formats

Other ways of publishing information beyond traditional printing. Here are some examples:

- audio format such as cassettes or digital audio format
- Braille used by some people who are blind or deaf-blind
- videos that may be helpful to people with certain learning disabilities
- easy-to-read, simplified summaries of materials for people with developmental or intellectual disabilities.

Service animal

An animal - usually a dog - that is trained to help a person with a disability. Service animals help people:

- with autism or other developmental/intellectual disabilities
- with vision loss
- who are Deaf, oral deaf, deafened or hard of hearing
- · with mental health disabilities
- with physical disabilities
- who have epilepsy or other seizure disorders.

Service animals are also called guide dogs or dog guides.

Support person

Someone who accompanies a person with a disability to help them with communication, mobility, personal care or medical needs, or with access goods or services.

2.2 Provision of Services

In keeping with CCHC's mission of providing free and equitable access in a welcoming and supportive environment, CCHC will:

- Provide services in a manner that respects the dignity and independence of people with disabilities and provides them with an equal opportunity to learn about, use or benefit from CCHC services.
- Integrate services for people with disabilities. CCHC understands that equitable access sometimes requires different treatment including separate or specialized services. Such services will be offered in a way that respects the dignity and full participation of people with disabilities.

2.3 Service Animals

CCHC welcomes service animals that are needed to assist people with disabilities.

2.4 Support people

CCHC welcomes people with disabilities and accompanying support people. In most cases, CCHC does not charge for the programs and services that it offers. However, when admission fees are charged for programs or services, admission fees will be waived for support people or advance notice will be given of any admission fees that support people must pay.

2.5 Assistive Devices

CCHC offers a broad range of assistive devices to meet the needs of people with disabilities and will make reasonable efforts to permit the use of assistive devices that enable people with disabilities to use the CCHC's services. CCHC also recognizes that accessibility can be achieved and provided in different ways.

2.6 Notice of temporary service disruption

CCHC will provide notice of service disruptions which include the reason for the disruption, how long the disruption will last and a description of available alternatives, if any. In the event of an unplanned disruption, notice will be provided as quickly as possible.

2.7 Documentation of Accessible Customer Service

CCHC will document its policies, practices and procedures as required by the Customer Service Standard. Members of the public will be notified of the availability of this documentation which will be available in a variety of formats.

2.8 Training for staff, students, and volunteers

CCHC will provide training to employees, students, volunteers, and other persons providing services at Carlington on Ontario's Customer Service accessibility laws 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, students, volunteers, and other persons providing services.

2.9 Making a Complaint

CCHC welcomes feedback about its accessibility practices. Members of the public can make a complaint by contacting the Human Resources Manager, the Executive Director, or any member of Carlington staff. People wishing to make an anonymous complaint can use our survey boxes located throughout the centre, or by telephone, fax, email, or regular mail. Please see Appendix 1 for contact information.

Survey boxes are emptied each quarter. Accessibility complaints received through these boxes will be responded to when the surveys are collected and collated. Other anonymous complaints will be added to this group and a general response will be available from the Human Resources Manager.

Each quarter, the general complaints will be compiled and reviewed for trends. A summary of the complaints will be provided to the management team and the Board of Directors each year.

If a complaint has contact information provided, the Human Resources manager will respond within 10 days of receving the complaint. If not resolved at this point, then the general Carlington complaint process will be followed. This process is attached as Appendix 3.

3. Integrated Accessibility Standards Policy

Policies on Employment and Information and Communication

The following policies have been established by CCHC to govern the provision of programs and services to comply with Regulation 191/11, "Integrated Accessibility Standards" ("IAS"). These standards are designed to break down barriers and increase accessibility for people with disabilities in the areas of information and communications, employment, and transportation.

3.1 Training Requirements

Carlington will ensure that training is provided on the requirements of the Integrated Accessibility Standards and continue to provide training on the Ontario *Human Rights Code* as it pertains to persons with disabilities, to employees, staff, volunteers, and all persons who participate in developing CCHC policies. The training will be appropriate to the duties of the job held by the person being trained.

Staff will be trained when changes are made to the accessibility policy. New staff will be trained when starting employment.

Carlington will keep a record of training provided under the IAS.

3.2 Information and Communications Standards

Feedback

Carlington will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, CCHC will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. CCHC will consult with the person making the request to determine the suitability of an accessible format or communication support.

CCHC will notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

CCHC will ensure that its Internet and Intranet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.00, at Level AA except where this is impractical.

3.3 Employment Standards

Recruitment

Carlington will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Selection Processes

Carlington will notify job applicants, when they are individually selected to participate in the selection process, that accommodations in materials or processes used are available upon request.

If a selected application requests an accommodation, the Human Resources Manager will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

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

Support Available to Employees

Carlington informs employees of policies and updates to policies used to support employees with disabilities. Upon the request of an employee with a disability, the Human Resources Manager will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform job duties and to participate in the general workplace culture of Carlington.

Workplace Emergency Response Information

Carlington will provide individualized workplace emergency response information to employees who have a disability that requires such individual information, when aware of the need for an accommodation due to a disability. The Human Resources Manager will provide this information as soon as practical after becoming aware of the disability.

When an employee requires assistance, the Human Resources Manager will, with the consent of the employee, provide the workplace emergency response information to the person designated to provide assistance.

The workplace emergency response information will be reviewed when the employee moves to a new work location, when the employee's accommodation needs change, and when the general emergency response policies are reviewed.

Documentation of Individual Accommodation Plans

Accommodation plans and emergency response plans will be documented and maintained in the employee's HR file.

Return to Work Process

Carlighton will maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations to return to work.

Performance Management, Career Development, and Advancement & Redeployment

Carlington will continue to take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance appraisals, providing career development, or when redeploying employees.

Appendices

Appendix 1: Alternate Formats for this policy

If you would like a copy of this policy in an alternate format please

Visit main reception

Call 613.722.400

TTY 613.761.9106

Email us at info@carlington.ochc.org

Mail us at:

Carlington Community Health Centre 900 Merivale Road Ottawa, ON K1Z 5Z8

Appendix 2: Training Plan

As noted in policies 2.8 and 3.2, Carlington will ensure all staff, students, volunteers, and other persons providing services at Carlington have training in all pertinent AODA standards.

Currently one document provides the information and links needed for all AODA training. That document can be found at:

F:\Shared\AODA\Staff training AODA\Overall training AODA 2014-07 Staff Final.pdf

- 1. Customer Service Standard (CSS) training includes
 - a. online "Serve-Ability" training found on the Province of Ontario web site, with a certificate of completion, and
 - b. more specific training on Carlington policies and procedures follows this training.
- 2. Integrated Accessibility Standards Regulation (IASR) training includes
 - a. online videos from the Human Rights Commission,
 - b. online videos from the AccessForward site on the various parts of the standard, and
 - c. Carlington-specific information on policies and procedures.
 - d. A knowledge review of the concepts learned is included at the end of the document that must be completed to pass the training.
- 3. Staff with supervisory functions are provided additional training pertinent to supervisors.

Changes to accessibility policies and procedures will be communicated to staff in a format deemed most suited to the type of change.

Appendix 3: Complaints Process

Client makes a written or verbal complaint to the ED and or Program director

Verbal complaint made by the complainant to the staff

The Human Resources Manager will attempt to solve the problem.

Not a satisfactory resolution, supervisor intervenes by following the steps below

Written complaints should be responded to within 72 hours

Investigation occurs within 10 working days, supervisor responds to both client and staff involved, with proper documentation

Managers inform the ED of the results of the investigation and any actions that will have/ been taken and completes the client complaint log form

The ED will contact and follow up with the complainant if required

If the issue is not resolved to the complainant's satisfaction, the ED may inform the BD chair or ask for assistance of another professional.

Reports will be sent to the BD and senior leadership team semi-annually.

Comment / suggestion boxes

Complaint is put into the comment/compl aints/suggestion box

ED's Admin Asst removes complaints from suggestions box Admin logs complaints and sends to the SLT each quarter