

POLICY & PROCEDURE Title Accessibility for Ontarians with Disabilities Accessible Customer Service and Integrated Accessibility Standards	
Category Human Resources, Organizational Development & Equity	
Sub-Category Accessibility	Version # 3
Approver V.P Human Resources, Organizational Development & Equity	Owner Director, Human Resources & Organizational Development
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1.0 Purpose

Include brief statement(s) about the overall purpose of the policy, i.e. what outcome(s) is the policy intended to achieve?

The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) has as its stated purpose:

“To achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.”

Home and Community Care Support Services Hamilton Niagara Haldimand Brant (HNHB) is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

This policy establishes the accessibility standards for customer service for Home and Community Care Support Services HNHB, in accordance with the requirements of Ontario Regulations 429/07 and 191/11.

2.0 Scope

Include brief statement(s) that identify to whom (e.g. specific people or groups) and to which specific items the policy applies. Specify exclusions to clarify scope, if needed.

This policy applies to Home and Community Care Support Services HNHB staff who deal with the public or other third parties as well as persons involved in developing Home and Community Care Support Services HNHB policies, procedures and practices pertaining to the provision of goods and services to the public or other third parties, whether they do so as employees, volunteers, agents or otherwise.

3.0 Definitions

Set out definitions of key terms used.

The AODA and Ontario Regulations [429/07](#) and [191/11](#) contain and refer to various definitions that are relevant to this policy, some of which are set out below.

Barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her 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 refers to,

- (a) 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 co-ordination, 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,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the [Workplace Safety and Insurance Act, 1997](#) (“handicap”)

Guide Dog refers to a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations [Blind Persons’ Rights Act, 1990](#) s1 (1))

Service Animal means an animal acting as a service animal for a person with a disability,

- (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability

Support Person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services

“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

“Communication Supports” may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

4.0 Policy Statement(s)

Policy statements are about identifying the broad principles or standards of expected action or behaviour and/or compliance.

Home and Community Care Support Services Hamilton Niagara Haldimand Brant 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 requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

Communications

Home and Community Care Support Services HNHB supports an accessible Ontario where the independence and integration of those with disabilities is promoted. When communicating with a person with a disability, individuals working on behalf of Home and Community Care Support Services shall do so in a manner that takes into account the person's disability and will make reasonable efforts to have the person with a disability understand both the content and intent of its communications.

Use of Assistive Devices

Home and Community Care Support Services HNHB is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. Home and Community Care Support Services will ensure that staff are trained on or about the assistive devices made available by Home and Community Care Support Services and realize that persons with disabilities may use their own assistive devices to access Home and Community Care Support Services goods and services.

Use of Service Animals

Home and Community Care Support Services is committed to welcoming people with disabilities and their service animals on the parts of our premises that are open to the public and other third parties and will permit the person to keep the service animal with them. Home and Community Care Support Services will also ensure that all persons to whom this policy applies have been trained on how to interact with people with disabilities who are accompanied by a service animal.

If the service animal is excluded by law from HCCSS HNHB premises, Home and Community Care Support Services shall ensure that measures are available to permit persons with disabilities to access Home and Community Care Support Services goods and services through other means.

Use of Support Persons

Home and Community Care Support Services is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter Home and Community Care Support Services' premises with their 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 Home and Community Care Support Services premises.

In the event that a fee is charged by Home and Community Care Support Services in relation to a support person's presence on Home and Community Care Support Services' premises, advanced notice of the fee will be provided.

On occasion persons with disabilities require the assistance of a support person to protect their health and safety or the health and safety of others. If necessary, Home and Community Care Support Services may require a person with a disability to be accompanied by a support person while on Home and Community Care Support Services' premises for the purpose of protecting the health and safety of the person with the disability or others on the premises.

Notice of Temporary Disruptions in Services and Facilities

In order to obtain, use or benefit from Home and Community Care Support Services, persons with disabilities usually use particular facilities or services of Home and Community Care Support Services. If there is a temporary disruption in those facilities or services in whole or in part, Home and Community Care Support Services shall give notice of the disruption to the public.

The notice of the disruption will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. Notice may be given by posting the information at a conspicuous place on premises owned or operated by Home and Community Care Support Services, by posting it on Home and Community Care Support Services' website, if any, or by such other method as is reasonable in the circumstances.

Training

Home and Community Care Support Services will ensure appropriate levels of training to all employees, volunteers, students, agents and others who deal with the public or other third parties on behalf of Home and Community Care Support Services as well as those who are involved in the development and approvals of policies, practices and procedures dealing with the provision of goods and services to the public or other third parties.

We are committed to training all staff about accessible customer service and other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

This training will be provided to all staff as soon as practicable and in keeping with the requirements of Ontario Regulations [429/07](#) and [191/11](#).

Records of training will be kept that include the dates on which training occurred and the number of persons trained.

Training will include the following topics

- The purposes of the [Accessibility for Ontarians with Disabilities Act, 2005](#)
- The requirements of the Accessibility Standards for Customer Service
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person

- How to use the assistive devices available at Home and Community Care Support Services offices and otherwise made available by Home and Community Care Support Services for persons with disabilities
- What to do if a person with a disability is having difficulty in accessing Home and Community Care Support Services' goods and services
- Home and Community Care Support Services' policies, practices and procedures relating to the provision of goods and services to the public and other third parties.

Staff will also be trained on an ongoing basis when changes are made to policies, practices and procedures dealing with the provision of goods and services to the public and other third parties.

Feedback Process

The ultimate goal of Home and Community Care Support Services is to meet and surpass customer expectations while serving customers with disabilities. Comments on Home and Community Care Support Services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way Home and Community Care Support Services provides goods and services to people with disabilities can be made in person, by telephone, in writing or by delivering an electronic text by email or other reasonable methods. Complaints will be addressed according to complaints categories already established in Home and Community Care Support Services' complaint management procedures.

Procuring or Acquiring Goods, Services, or Facilities

Home and Community Care Support Services shall incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so.

Information and Communication

Home and Community Care Support Services will make its internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines, at least at Level A, and increasing to Level AA.

Employment

Home and Community Care Support Services will notify internal and external job applicants, as well as successful applicants that, where needed, accommodations for disabilities will be provided upon request. Employees will be informed of relevant policies related to the provision of Job accommodations that take into account an employee's accessibility needs due to a disability.

Where an employee with a disability requests it, Home and Community Care Support Services shall arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job, and information that is generally available to employees in the workplace.

Home and Community Care Support Services Hamilton Niagara Haldimand Brant will provide customized emergency information to help an employee with a disability during an emergency. With

the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency. We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management and career development processes take into account the accessibility needs of all employees.

Availability of the AODA Documents

Home and Community Care Support Services shall prepare any additional documents describing its policies, practices and procedures as may be required by Ontario Regulations 429/07 and 191/11, upon request, shall give a copy of such documents to any person. Further, the Home and Community Care Support Services shall notify persons to whom it provides goods and services that the documents required under Ontario Regulation 429/07 are available upon request. This policy is available in accessible formats upon request.

Home and Community Care Support Services shall give the person the documents, or the information contained in the documents described above, in a format that takes into account the person's disability.

5.0 Procedures and Responsibilities

Include brief statement(s) identifying actions and responsibilities and the positions responsible for carrying out the steps aimed at ensuring the policy is adhered to.

Support persons may be a family member, friend or a trained professional. They provide a wide range of assistance to persons with disabilities including but not limited to assistance with communication, personal care and assistance accessing goods and services.

If a person with a disability is accompanied by a support person, Home and Community Care Support Services HNHB shall 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 their support person while on the premises.

Home and Community Care Support Services HNHB may require a person with a disability to be accompanied by a support person where Home and Community Care Support Services HNHB provides its goods and services on property that it owns and operates. Home and Community Care Support Services HNHB may require this if it is deemed necessary to protect the health and safety of the

person with the disability or the health and safety of others on the premises. This would occur after consultation with the person with the disability.

Even though Home and Community Care Support Services typically do not charge fees in relation to a support person's presence on Home and Community Care Support Services HNHB premises Home and Community Care Support Services HNHB will provide advanced notice in the event a fee is ever charged by Home and Community Care Support Services HNHB. Advanced notice will be given where information about fees are typically provided.

Dealing with Confidential Matters in the Presence of Support Persons

In some cases a support person may have to agree to rules or requirements that are specific to the kinds of goods or services that Home and Community Care Support Services HNHB provides. Where confidentiality is important because of the kinds of information discussed, Home and Community Care Support Services HNHB must obtain the consent of the client and may require the support person to sign a confidentiality agreement. As an option, in some situations it may be suitable for a support person to wait in a separate area while a client's confidential matters are addressed.

The patient's confidential information will be subject to the [Personal Health Information Protection Act, 2004](#).

Agents and Others Providing Goods and Services on Behalf of Home and Community Care Support Services

Agents and others providing goods and services on behalf of Home and Community Care Support Services HNHB will adhere to these procedures and practices.

6.0 Supporting Documents and Tools

List the tools that are available to staff in the implementation of this procedure.

Related Policies and Procedures

- Accessible Customer Service - Feedback and Complaints Procedure
- Accessible Customer Service - Notice of Temporary Disruptions in Services Procedure
- Accessible Customer Service - Provision of Goods and Services including the use of Assistive Devices Procedure
- Accessible Customer Service - Use of Service Animals by persons with Disabilities Procedure
- Accessible Customer Service - Use of Support Persons by persons with Disabilities Procedure

Job Aids and Forms

N/A

Other Supporting Documents

N/A

7.0 Related Legislation and Other References

List the related legislative documents (e.g. acts, regulations, and standards), government policy, and related Professional College policies, procedures, forms, templates, guidelines or committee terms of reference that together form a suite or framework for the specific policy matter.

External Resources/Links

- [Accessibility for Ontarians with Disabilities Act, 2005](#)
- [Ontario Regulation 429/07 – Customer Service Standards \(AODA\)](#)
- [Ontario Regulation 191/11 – Integrated Accessibility Standard \(AODA\)](#)

Supersedes

N/A