

HOME AND COMMUNITY CARE SUPPORT SERVICES

North Simcoe Muskoka

Policy and Procedure Manual

SECTION: Accessibility PAGE 1 OF 9
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SUBJECT: Accessibility Standards for Customer Service – Accessibility for Ontarians with Disabilities

STATEMENT OF ORGANIZATIONAL COMMITMENT:

Home and Community Care Support Services North Simcoe Muskoka (HCCSS NSM) is committed to the goal of improved accessibility for people with disabilities, as prescribed in the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. 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. The commitments in this policy are intended to ensure that accessibility remains a priority in HCCSS NSM's decision-making process and will serve to assist in ensuring that decisions improve accessibility and do not inadvertently create barriers.

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

HCCSS NSM is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.

PURPOSE:

The Accessibility for Ontarians with Disabilities Act (AODA), 2005 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 North Simcoe Muskoka (HCCSS NSM) must meet the requirements of accessibility standards established by

regulation. This policy establishes the accessibility standards for *customer service* for the organization, in accordance with Ontario Regulation 429/07. The standards outlined in this policy were implemented on January 1, 2010 and remain in effect.

SCOPE:

The Accessibility Standards for Customer Service applies to all HCCSS NSM's employees, students, volunteers, consultants, contractors/subcontractors, visitors, customers, clients, patients, applicants for employment with HCCSS NSM (who may require employment accommodation through the recruitment, assessment, selection, and hiring process), and any other third party providing goods, services, or facilities on HCCSS NSM's behalf.

POLICY:

The Accessibility Standards for Customer Service Regulation was created to ensure that goods and services provided in Ontario are accessible to people with disabilities, and that persons with disabilities are treated with respect, dignity and equality.

To achieve this mandate HCCSS NSM will make reasonable efforts to ensure that its policies, procedures and practices pertaining to the provision of goods and services to the public and other third parties adhere to the following guiding principles as set out in *Accessibility Standards for Customer Service: Ontario Regulation 429/07*:

1. The goods or services will be provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of goods or services to persons with disabilities and others will be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
3. Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.

Communications:

HCCSS NSM 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 HCCSS NSM 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. We will work with the person with disabilities to determine what method of communication works for them.

Use of Assistive Devices:

HCCSS NSM is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. HCCSS NSM will ensure that employees are trained on the use of assistive devices made available by HCCSS NSM and realize that persons with disabilities may use their own assistive devices to access HCCSS NSM goods and services.

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 goods, services or facilities.

Use of Service Animals:

HCCSS NSM 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. Anyone with a service animal must keep the animal with him/her at all times unless it is unlawful to do so at which time the animal would be kept in a safe place for the short term duration. HCCSS NSM 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.

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

If another law prohibits service animals, HCCSS NSM will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the client another way of providing goods, services or facilities

Use of Support Persons:

HCCSS NSM 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 the HCCSS's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on HCCSS NSM premises.

If a fee is charged regarding a support person's presence on HCCSS NSM premises, advance notice of the fee will be provided (e.g., if an admission fee to a special event was required).

Occasionally 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, HCCSS NSM may require a person with a disability to be accompanied by a support person while on HCCSS NSM premises for the purpose of protecting the health and safety of the person with the disability or others on the premises.

Before making a decision, HCCSS NSM will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

Notice of Temporary Disruptions in Services and Facilities:

To obtain, use or benefit from HCCSS NSM's services, persons with disabilities frequently use particular facilities or services of HCCSS NSM. If there is a temporary disruption in those facilities or services in whole or in part, HCCSS NSM shall give notice of the disruption to the public promptly where possible.

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. HCCSS NSM will notify by posting the information in a conspicuous place at the office location, by posting it on HCCSS NSM's website, or by such other method as is reasonable in the circumstances.

Training:

HCCSS NSM is committed to training all employees, volunteers, students, agents and others who deal with the public on behalf of HCCSS NSM in accessible customer service, other Ontario's accessibility standards, aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization

Training is provided to all staff as soon as practicable in keeping with the requirements of the Regulation. Training of our employees and volunteers on accessibility relates to their specific roles.

NSM HCCSS trains every person as soon as practicable after hire. Employees are 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.

HCCSS NSM maintains records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Training includes 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 HCCSS NSM offices and otherwise made available by HCCSS NSM for persons with disabilities
- What to do if a person with a disability is having difficulty in accessing HCCSS NSM's goods and services
- HCCSS NSM's policies, practices and procedures relating to the provision of goods and services to the public and other third parties.

Feedback Process:

The goal of HCCSS NSM is to meet and surpass customer expectations while serving customers with disabilities. Comments on HCCSS NSM services regarding how well those expectations are being met are welcome and appreciated. Feedback regarding the way HCCSS NSM provides goods and services to people with disabilities can be made in person, by telephone, by fax, in writing, by email, or other reasonable methods. Complaints will be addressed according to complaints categories already established in the HCCSS NSM's complaint management procedures. Information regarding the feedback process can be found on our website healthcareathome.ca

Notice of Availability of Accessible Customer Service Documents:

HCCSS NSM has prepared documents describing its policies, practices and procedures and, upon request, shall give a copy of a document to any person. HCCSS NSM has posted on its website healthcareathome.ca notification to persons to whom it provides services that the documents required under the Regulation are available upon request. HCCSS NSM will consult with the person making the request to determine the suitability of the format or communication support. HCCSS NSM shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability.

Procurement:

HCCSS NSM incorporates accessibility criteria and features when procuring or acquiring goods, services or facilities. If it is not possible and practical to do so, we will provide an explanation upon request.

Information and Communications:

HCCSS NSM has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request. We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

HCCSS NSM will consult with the person making the request in determining the suitability of an accessible format or communication support. If HCCSS NSM determines that information or communications are unconvertible, we will provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

HCCSS NSM notifies the public about the availability of accessible formats and communication supports by posting on our HCCSS website healthcareathome.ca. Our website meets internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Employment:

HCCSS NSM is committed to accommodating people with disabilities as part of our hiring process. HCCSS NSM advises employees, job applicants and the public that accommodations are available during the recruitment and hiring process by communicating it on our job postings, during the interview selection process and in the employment offer letter. Arrangements for suitable accommodations are made in consultation with job candidates.

During onboarding/orientation employees are advised that supports are available to those with disabilities as soon as practicable after they begin employment.

HCCSS NSM communicates updated information to employees whenever there is a change to existing policies on the provision of job accommodation that takes into account an employee's accessibility needs due to a disability.

HCCSS NSM will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee’s job; and
- b) information that is generally available to employees in the workplace

Workplace Emergency Response:

As soon as is practicable upon becoming aware of the need for accommodation due to the employee’s disability, HCCSS NSM 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 assisting that employee during an emergency.

HCCSS NSM 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.

HCCSS NSM has a written process to develop individual accommodation plans for employees including employees who have been absent from work due to a disability and require disability related accommodations in order to return to work.

Design of Public Spaces:

HCCSS NSM will meet accessibility laws when building or making major changes to public spaces. Our public spaces include accessible off-street parking.

Modifications to this or other policies:

HCCSS NSM is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Any policy of HCCSS NSM that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

GLOSSARY OF TERMS:

All of the following terms were defined as such within AODA legislation or regulations unless otherwise noted.*

Assistive Devices

- May include TTY machines, walkers, canes, magnifying glasses, wide pens.

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").

Customer

- Includes patients and visitors of HCCSS NSM.

Disability means:

- 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,
- a condition of mental impairment or a developmental disability,
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- a mental disorder, or
- 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

- Means 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, o if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - o 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.

Agent

- Is any person or organization that provides goods or services on behalf of HCCSS NSM. This includes but may not be limited to service providers

Third Party

is a generic legal term for any individual who does not have a direct connection with a legal transaction with HCCSS NSM but who might be affected by it, for example, a participant in a meeting that is held at HCCSS NSM, or a person who visits HCCSS NSM's office who is a representative of an Agent of HCCSS NSM, but is not a direct employee of HCCSS NSM or the Agent. It can also mean other customers, such as other businesses HCCSS NSM provides services to.

REFERENCES/CONSULTATION/RELATED DOCUMENTS:

- HCCSS NSM All Management Team (consultation)
- HCCSS NSM Policy: [Accommodation for Employees with Disabilities](#)
- HCCSS NSM Policy: [Health and Safety Legal Requirements](#)
- HCCSS NSM Policy: [Health and Safety Orientation](#)
- HCCSS NSM Policy: [Home Office - Health and Safety](#)
- [Accessibility for Ontarians with Disabilities Act, 2005](#)
- [Ontario Human Rights Code](#)