

## HCCSS WW Accessibility for Ontarians with Disabilities Policy

BU / Division Name	People Culture and Development
Department	Physical and Psychological Safety
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Replaces	Admin 1.1 AODA Overview 1.10 AODA Integrated Accessibility Standards, 1.11 AODA Statement of Commitment, 1.8, 887 request for Accessibility (Recruitment) – Fillable, 887A Request for Accessibility AODA (Communication), Fillable

## PURPOSE

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

The purpose of this policy is to outline the practices and procedures in place at Home and Community Care Support Services Waterloo Wellington (HCCSSWW) to help identify and remove barriers that impede a person’s ability to access care and services. This includes clients, customers, families, staff and members of HCCSSWW communities.

## SCOPE

It is the responsibility of all HCCSSWW Members to read, follow and participate ensuring that the facilities and services that we provide at the HCCSSWW continue to meet or exceed the requirements of the Accessibility for Ontarians with Disabilities legislation (AODA).

## INTENDED AUDIENCE

This policy applies to HCCSSWW Members who deal with members of the public and other third parties, and to HCCSSWW Members involved in developing HCCSSWW policies, procedures and practices pertaining to the provision of goods and services to members of the public and other third parties with regard to meeting the requirements of AODA.

## POLICY

The below policy must be read, applied, and implemented in conjunction with other Policies, Procedures, Forms and Template that (if any) are mentioned in the last page of this document.

The HCCSSWW is committed to ensuring that our services are accessible to all members of our community and staff. This includes those who may have disabilities. This policy outlines our commitment to ensure that HCCSSWW remains in compliance with the Accessibility for Ontarians with Disabilities Act (AODA). HCCSSWW has appropriate procedures and practices in place at the HCCSSWW to help identify and remove barriers that impede a person’s ability to access care and services. This includes clients, customers, families, staff and members of HCCSSWW communities. HCCSSWW is responsive to the needs of our residents who may need additional accommodation in keeping with this legislation.

In keeping with the principles set out in the AODA and WWLHINS’ vision “Acting in the Best Interest of Our Resident’s Wellbeing” the HCCSSWW is committed to providing respectful services that focus on the unique needs of every individual. This includes:

- Providing services in a manner respecting the dignity and independence of persons with disabilities.
- Providing services to persons following the same process, regardless of ability level unless an alternate measure is necessary, on a temporary or on a permanent basis, to enable a person with a disability to receive goods or services.
- Persons with disabilities, and those without, are given equal opportunity to obtain, use and benefit from HCCSSWW goods or services.

This policy defines the requirements and process for HCCSSWW's compliance with applicable AODA guidelines. It is accompanied by the HCCSSWW's Multi-Year Accessibility Plan which outlines the specific measures the HCCSSWW will take to achieve compliance by the legislated date.

## **Communications**

The HCCSSWW supports an accessible Ontario in which independence and integration of those with disabilities is promoted. When communicating with a person with a disability, individuals working on behalf of HCCSSWW shall do so in a manner that takes into account the person's disability, and shall make all reasonable effort to have the person with a disability understand both the content and intent of the communications. Communication will be in a format accessible to the person with the disability.

### **Information and Communications Standard**

Under the Information and Communications Standard, the HCCSSWW creates, provides and receives information/communications in ways that are accessible to people with disabilities. To accommodate this, HCCSSWW:

- Ensures that its internet website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A.
- Informs HCCSSWW Members of policies procedures and practices used to support HCCSSWW Members with disabilities, including the provision of job accommodations that take into account an HCCSSWW Member's accessibility needs due to disability.
- This information is provided to new HCCSSWW Members during their orientation.

Upon the request of an HCCSSWW Member with a disability, HCCSSWW shall consult with the HCCSSWW Member to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the HCCSSWW Member's job, and information that is generally available to other HCCSSWW Members. In determining the suitability of an accessible format or communication support, HCCSSWW shall consult with the HCCSSWW Member making the request and review any supporting medical documentation.

## **Employment Standards**

The Employment Standard builds upon the existing requirement under the Ontario's Human Rights Code in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship. Specifically, the HCCSSWW will ensure that the following aspects comply with this standard:

- **Recruitment** – HCCSSWW shall notify HCCSSWW Members and the public about the availability of accommodations for applicants with disabilities in the HCCSSWW recruitment process.
- **Assessment or Selection Process** - HCCSSWW shall notify job applicants, when they are individually selected to participate further in an assessment or selection process at HCCSSWW, that accommodations are available upon request in relation to the materials or processes to be used in the assessment or selection process. If a selected participant requests accommodation, the HCCSSWW shall 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, HCCSSWW shall notify the successful applicant of HCCSSWW's policies for accommodating HCCSSWW Members with disabilities.

### **Use of Assistive Devices**

The HCCSSWW is committed to serving all persons with disabilities, including those who use assistive devices to obtain, use, or benefit from HCCSSWW goods and services. The HCCSSWW ensures HCCSSWW Members are trained on or about the assistive devices made available by HCCSSWW, and HCCSSWW Members accept persons with disabilities may use their own assistive devices to access HCCSSWW goods and services.

### **Use of Service Animals**

The HCCSSWW welcomes persons with disabilities to keep their service animals with them on the parts of HCCSSWW premises that are open to members of the public and to other third parties. All HCCSSWW Members to whom this policy applies are trained on how to interact with persons with disabilities who are accompanied by a service animal.

- Clients with a disability may enter premises accompanied by a service animal and keep the animal with them, wherever the public has access to and if the animal is not excluded by law.
- Service animals may be identified by any one of the following methods:
  - The animal may be wearing a service animal vest, harness or saddle packs
  - The animal may be observed providing assistance
  - The person may have a letter from a physician, nurse, psychologist, psychotherapist, audiologist, chiropractor or optometrist stating that they require the animal for reasons related to a disability
  - The client may show a valid identification card or training certificate from a recognized service animal training school
- It is the responsibility of the client to ensure that:
  - their service animal is kept in control at all times and is well behaved
  - The service animal does not pose a health or safety concern
  - The service animal's immunizations are up-to-date.

- If these responsibilities are not upheld, the service animal may be removed and alternate arrangements will be made to support the client with the disability in the animal's absence.
- Every effort will be made to accommodate and ensure that the relationship with the animal.
- In situations where there are individuals who have a pathological fear or severe allergy to particular animals, every effort will be made to accommodate the animal. However, if the animal must be segregated, alternate arrangements will be made to support the client in the animal's absence.

If the service animal is excluded by law, or reasons above from parts of the HCCSSWW premises, the HCCSSWW shall ensure that measures are available to permit persons with disabilities to access HCCSSWW goods and services through other means.

### **Use of Support Person**

The HCCSSWW welcomes persons with disabilities and their accompanying support person, and allows both parties to enter HCCSSWW premises. At no time will a person with a disability, who is accompanied by a support person, be prevented from having access to that person while on HCCSSWW premises. In the event that a fee is charged in relation to a support person's presence on HCCSSWW premises, advanced notice of the fee will be provided.

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

- If a client with a disability is accompanied by a support person, HCCSSWW ensures that both persons are permitted to enter the premises together and that the client with a disability is not prevented from having access to their support person while on the premises.
- It is necessary to seek the consent of the client before discussing confidential personal health information in the presence of the support person. If the support person is required to wait in a separate area while a client's confidential matters are addressed, accommodations will be made to support the client in the support person's absence.

### **Notice of Temporary Disruptions in Services and Facilities**

In order to obtain, use or benefit from the HCCSSWW's services, persons with disabilities usually use particular facilities or services of the HCCSSWW. If there is a temporary disruption in those facilities or services in whole or in part, the HCCSSWW 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 will be given by posting the information at a conspicuous place on HCCSSWW

premises, by posting it on the HCCSSWW's website or by such other method as is reasonable in the circumstances.

## **Training**

The HCCSSWW ensures appropriate levels of training of all HCCSSWW Members, who deal with members of the public and other third parties on behalf of HCCSSWW, as well as those who are involved in the development and approval of policies, practices and procedures dealing with the provision of goods and services to members of the public and other third parties.

New HCCSSWW Members are trained as part of their orientation. HCCSSWW Members 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 members of the public and other parties.

Records of training are to be kept, including the dates on which training occurred, and the number of persons trained. Training will include the following topics:

- The purposes of the AODA
- The requirements of the Accessibility Standards for Customer Service
- How to interact and communicate with persons with various types of disabilities
- How to interact with persons 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 HCCSSWW offices and otherwise made available by the HCCSSWW for persons with disabilities
- What to do if a person with a disability is having difficulty in accessing the HCCSSWW's goods and services
- HCCSSWW's policies, practices and procedures relating to the provision of goods and services to members of the public and other third parties.
- the requirements of the Integrated Accessibility Standards Regulation as set out in this Policy and on the Human Rights Code, as it pertains to persons with disabilities. Training shall be appropriate to the duties of HCCSSWW staff members and shall be provided to all HCCSSWW staff as soon as practical in keeping with the AODA and on an ongoing basis when changes are made to the policies, procedures and practices. The training will include details about key principles and accessibility strategies and tools. HCCSSWW staff will also receive updates when changes are made to this Policy. A record will be kept of HCCSSWW staff who have received training, including:
  - the dates on which training was provided,
  - a summary of the contents of the training, and
  - the names of the individuals to whom it was provided.
- New HCCSSWW Members and students will receive training as part of the Corporate Orientation program.

## **Feedback Process**

The goal of the HCCSSWW is to exceed customer expectations while serving customers with disabilities. Comments regarding how well HCCSSWW is meeting those expectations are welcome and appreciated, and may be made in person, by telephone, in writing or via email, diskette or other similar method. Complaints will be addressed according to complaint and complements

management processes established by the HCCSSWW. Any individual can submit feedback to HCCSSWW either by phone or email details available on the HCCSSWW's website.

### **Availability of the Accessible Customer Service Documents**

The HCCSSWW shall notify persons to whom it provides goods and services that all documents required under Ontario Regulation 429/07 are available upon request. When requested, the HCCSSWW shall provide copies of documents describing its policies, practices and procedures related to Ontario Regulation 429/07, in accordance with our records and Privacy practices. The HCCSSWW 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.

### **Individual Accommodation Plans**

HCCSSWW has a written process for the development of Individual Accommodation Plans (IAPs) for HCCSSWW Members with disabilities. IAPs include:

- any information regarding accessible formats and communications supports provided (if requested),
- individualized workplace emergency response information (if required), and
- identify any other accommodation that is to be provided to the HCCSSWW Member.

The process for the development of IAPs includes the following elements:

- i. the manner in which an HCCSSWW Member requesting accommodation can participate in the development of the IAP;
- ii. the means by which the HCCSSWW Member is assessed on an individual basis;
- iii. the manner in which HCCSSWW can request an evaluation by an outside medical or other expert, at HCCSSWW's expense, to assist HCCSSWW in determining if and how accommodation can be achieved;
- iv. the manner in which the HCCSSWW Member can request the participation of a HCCSSWW representative in the development of the IAP;
- v. the steps taken to protect the privacy of the HCCSSWW Member's personal information;
- vi. the frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- vii. if an IAP is denied, the manner in which the reasons for the denial will be provided to the HCCSSWW Member; and
- viii. the means of providing the IAP in a format that takes into account the HCCSSWW Member's accessibility needs due to disability.

### **Return to Work Process**

HCCSSWW maintains a return to work process for HCCSSWW Members who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process outlines the steps HCCSSWW will take to facilitate the return to work and includes IAPs as part of the process. This return to work is the same as our RTW process for a work related injury or illness.

## **Performance Management**

HCCSSWW takes into account the accessibility needs of HCCSSWW Members with disabilities, as well as IAPs, when conducting performance management and providing career development and advancement opportunities to HCCSSWW Members.

## **Reporting**

HCCSSWW files an accessibility report with the director appointed under the AODA regarding its compliance with the Accessibility Standards annually or at such other times as the director may specify. All filed accessibility reports are made available to the public upon request.

## **Emergency Information**

Emergency procedures, plans or public safety information prepared by the HCCSSWW and made available to the public is provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

## **Workplace Emergency Response Information**

- **Individualized Information** – HCCSSWW will provide individualized workplace emergency response information to an HCCSSWW Member who has a disability, if the disability is such that the individualized information is necessary, and if the HCCSSWW Member makes HCCSSWW aware of the need for accommodation due to the HCCSSWW Member's disability. HCCSSWW will provide this information as soon as practicable after becoming aware of the need for accommodation.
- **HCCSSWW Members Requiring Assistance** – When a HCCSSWW Member requires assistance, HCCSSWW will, with the consent of the HCCSSWW Member, provide the workplace emergency response information to the person designated by HCCSSWW to provide assistance to the HCCSSWW Member.
- **Reviewing the Workplace Emergency Response Information** – HCCSSWW shall review the individualized workplace emergency response information developed for a HCCSSWW Member when the HCCSSWW Member moves to a different location at HCCSSWW, when the HCCSSWW Member's overall accommodations needs or plans are reviewed, and when HCCSSWW reviews its general emergency response policies.

## **Multi-Year Accessibility Plan**

The Human Resources department, in conjunction with the Physical and Psychological Safety Resource, Communications representative and Information Technology Representative comprise the Accessibility Committee, and in consultation with persons with disabilities, has developed an Accessibility Plan which outlines a phased strategy to address the current and future requirements of the AODA.

HCCSSWW Accessibility Committee Reports annually to HCCSSWW's Senior Leadership Team and Board of Directors on the progress and implementation of the Plan. The Human Resources department will review and update the Accessibility Plan in consultation with persons with disabilities once a year. The updated Accessibility Plan will be posted on an annual basis on HCCSSWW's website. Upon request, HCCSSWW shall provide a copy of the Accessibility Plan to persons with disabilities in an accessible format.

### **Improving Access to HCCSSWW's Goods and Services**

The HCCSSWW encourages people with disabilities to use their own personal assistive devices to improve access to HCCSSWW's goods and services. The following strategies will be utilized to improve access to HCCSSWW services

- Enabling people with disabilities to access our services by offering assistive devices and measures.
- Communicating with a person with a disability in a manner that takes into account his or her disability.
- Allowing people with disabilities to bring their guide dog or service animal with them to areas of the premises that are open to the public.
- Permitting people with disabilities who use a support person to accompany them and ensuring that a person with a disability has access to his or her support person while on our premises.
- Providing notice when facilities or services that people with disabilities rely on to access our services are temporarily disrupted.
- Establishing a process for people to provide feedback on how goods or services are delivered and explaining how HCCSSWW will respond to any feedback and what action will be taken.
- It is the responsibility of every staff member to be attentive to the concerns of patients, their families and visitors and to resolve concerns related to accessibility.
- There are a number of strategies that are available to patients, families/staff to provide feedback regarding accessibility.

### **DEFINITIONS**

- **Accessibility** – A general term used to describe the degree of ease that something (e.g. device, service and environment) can be used and enjoyed by persons with a disability. The term implies conscious planning, design and/or effort to ensure it is barrier-free to

persons with a disability and, by extension, highly usable and practical for the general population as well.

- **Accessible Formats** – Formats that are an alternative to standard print that may include, but are not limited to large print, recorded audio and electronic formats such as HTML and MS Word, Braille and other formats usable by persons with disabilities.
- **Barrier** – 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”)
- **Communications** - The term communications as used in the Information and Communications Standard refers to the interaction between two or more people or entities when information is provided, sent or received.
- **Communication Supports** – Supports that individuals with disabilities may need to access information. Some examples include plain language formats, sign language, as well as reading out loud, captioning, or using written notes to communicate
- **Disability** – 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, other animal, 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*
- **Guide Dog** – a dog trained as a guide for a blind person and having the qualifications prescribed by the *Blind Persons’ Rights Act 1990*
- **Individual Accommodation Plan** – a plan for an individual that includes any information regarding accessible formats and communications supports requested and provided, include individualized workplace emergency response information if appropriate and identify any other accommodation that is to be provided
- **Practicable** – Means as soon as it able to be done or put into action, given all of the circumstances after a person with a disability asks for the information in an accessible format or with communication supports, or to the organization’s ability given all of the circumstances to modify their websites and web content.

- **Performance Management** – means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success
- **Service Animal** – an animal acting as a service animal for a person with a disability:
  - if it is readily apparent that the animal is used by the person for reasons relating to his or her disability, or
  - 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:** an individual who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services
- **HCCSSWW Member** – employed or contracted HCCSSWW Member, students, volunteers, Board Members, and affiliates of the HCCSSWW.

## Document Control Record

### Version History

Version Number	Date Issued	Description
1.0	July 6 2015 Mar. 20, 2013	Admin 1.1 AODA Overview 1.10 AODA Integrated Accessibility Standards, 1.11 AODA Statement of Commitment, 1.8, 887 request for Accessibility (Recruitment) – Fillable, 887A Request for Accessibility AODA (Communication), Fillable
2.0	July 20, 2018	Replaces above

Note: This document is scheduled for review **one year** from date of publication

Note: Updated to HCCSSWW November 11, 2021

### Related Procedures, Forms & Template:

Document Type	Title
Forms and Templates	887 Request for Accessibility (Recruitment) – Fillable, 887A Request for Accessibility AODA (Communications)
Multi Year Accessibility plan 2014 - 2019	HCCSSWW Multi Year Accessibility Plan 2014 - 2019

### Other Related Policies:

Department	Policy Name
N/A	N/A

**Document Sign-Off:**

<b>Name</b>	<b>Title</b>	<b>Responsibility</b>	<b>Signature</b>	<b>Date</b>
Tom Smith	Physical and Psychological Safety Consultant	Policy Author and Administrator		July 20, 2018
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