



Policy and Procedure Manual

Topic: Accessibility					
Section: Organizational					
Cross Reference: <i>CHCN Welcoming Policy</i>					
Relevant Legislation: <i>Accessibility for Ontarians with Disabilities Act, 2005</i>					
Original date: April, 2011					
Approved by: Management					
Reviewed/Revised Dates					
Date: Aug., 2015	Date: Jan. 15, 2020	Date:	Date:	Date:	Date:
Initial: T.R.	Initial: T.R.	Initial:	Initial:	Initial:	Initial:
Date of next review: January, 2024					
Person designated to ensure revision and adherence: Director of Corporate Services					

Purpose: The CHCN strives to provide services and facilities that are available to all individuals regardless of disability and in a manner that:

- Removes barriers and limitations that would hinder access to our facilities or participation in our services or employment.
- Acknowledges the wish to maintain an individual’s own level of independence, and further, treat all with dignity and respect.
- Is free of prejudice and discrimination.

Policy: The Community Health Centres of Northumberland (CHCN) is committed to providing a barrier-free environment to all stakeholders, including clients, employees, volunteers, job applicants, third parties, and any visitors who enter the premises and access information provided by our agency, or use our agency’s services.

CHCN will continually work to break down barriers that prevent or limit persons with disabilities from employment, receipt of services, the physical environment, and information and communication through the implementation of accessibility standards outlined in the Accessibility for Ontarians with Disabilities Act , 2005 (AODA), and further requirements of the Integrated Accessibility Standards Regulation (IASR) under the AODA.

As part of its commitment to service excellence, the CHCN commits to ensuring accessibility to its services for all individuals and has additionally implemented an *Accessible Client Service Plan* to support this commitment.

Procedure:

In order to meet the requirements of the AODA, the CHCN will ensure that it fulfills the general requirements set out under the Integrated Accessibility Standards Regulation.

ACCESSIBILITY POLICIES

The CHCN is required by the AODA to develop one or more policies that govern how our organization will comply with the IASR. This policy has been adopted to fulfill this requirement and must be made public and in an accessible format upon request.

MULTI-YEAR ACCESSIBILITY PLAN

The CHCN is required to develop and maintain a multi-year accessibility plan through input from its clinical practices committee. Its purpose is to identify and address barriers to accessibility and comply with the IASR.

FACILITIES, GOODS, AND SERVICES PROCUREMENT

As a requirement of the AODA, the CHCN shall endeavor to include accessibility criteria in the procurement of goods, services and facilities. When this is not possible, a written explanation shall be provided upon request.

EDUCATION & TRAINING

The CHCN will provide training required by the AODA to its employees, volunteers and others who deal with the public or other third parties on their behalf. This training includes the AODA, the Ontario Human Rights Code, and accessible customer service.

Further training may include:

- This policy and the formal Accessible Client Service Plan.
- How to best interact and communicate with people with various types of disabilities.
- How to best interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person.
- How to use communication devices including a “pocket talker”, mobility devices, and access to a sign language interpreter.
- What to do if a person with a disability is having difficulty accessing CHCN's services.

EMPLOYEES, VOLUNTEERS & THIRD PARTIES

All employees and other persons acting on behalf of the CHCN shall:

- Maintain compliance with this policy.
- Have a thorough understanding of their rights and responsibilities under this policy.
- Include accessibility considerations in the development of services and facilities by participating in identifying accessibility barriers and planning for barrier removal.
- Provide a safe and equitable environment for individuals with disabilities, including any person with a disability accompanied by a support person or service animal or using assistive devices.
- Accommodate and provide requested information in accessible formats and takes an individual's disability into consideration.
- Facilitate a process of responding to feedback concerning the manner in which the CHCN provides goods, services, and facilities to persons with disabilities.
- Facilitate requests for accommodations in a timely manner and in accordance with the Ontario Human Rights Code.

DIRECTORS & MANAGEMENT

In addition to the roles and responsibilities of employees, volunteers and third parties set out above, managers, directors and those in supervisory roles at CHCN shall:

- Promote awareness and compliance with this policy.
- Act on non-compliance issues regarding this policy.
- Ensure that employees, volunteers and third parties that provide goods or services to the CHCN receive the appropriate training and skills required to identify and remove barriers to accessibility.
- Foster and promote leadership to provide an inclusive and equitable environment for all including the creation and review of all practices, policies, procedures and bylaws.
- Ensure financial resources that may prevent accessibility barriers are budgeted for.
- Ensure that through this policy, the CHCN act on non-compliance AODA issues and addresses complaints of undue hardship in accordance with the Ontario Human Rights Code.

INFORMATION & COMMUNICATION

ACCESSIBLE FORMATS

The CHCN will provide requested information that is a format accessible to the recipient as required by the AODA and IASR.

The CHCN shall provide information, records and communication produced either directly or indirectly, through contractual relationships, to an individual and in an accessible format upon request. The CHCN must consult with the individual to best determine which format is acceptable, and further, provide it in a reasonable timeframe free of cost. If the information is not convertible to the format requested, the CHCN shall provide a written explanation why not, and provide documentation as to which information is not convertible.

AVAILABILITY OF DOCUMENTS

The CHCN will maintain a current copy of this policy on its website, and upon request, in an appropriate format to the requestor.

ACCESSIBLE WEBSITE & CONTENT

The AODA requires that the CHCN must provide an accessible version of its website and that conforms to the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. The website shall be made accessible with input, direction and a timeline on behalf of our Quality and Technology Committee.

EMERGENCY PROCEDURES & DISRUPTION NOTICES

The AODA requires that the emergency safety procedures and plans which are available to the general public, also be provided in an accessible format upon request. In the event of a planned or unexpected disruption to services for clients with disabilities, the CHCN will notify clients promptly - including clearly posting a notice with information about the reason for the disruption, its anticipated duration length of time, and a description of alternative facilities or services, if available.

The notice will be placed on the bulletin board outside the main doors of the CHCN, on our website, and on our telephone message system.

FEEDBACK

Clients who wish to provide feedback to the CHCN regarding the services it provides to persons with disabilities can do so either verbally or in writing by submitting comments to our on-site suggestion box or by e-mail. All feedback will be directed to the Director of Corporate Services. Clients should expect a response to their feedback within seven business days. Complaints will be addressed and handled according to our organization's Complaint and Appeals policy.

POLICY CHANGES

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

CLIENT & CUSTOMER SERVICE

The CHCN strives to provide excellent service to all individuals including those with disabilities. We are committed to complying and developing policies that respect the AODA and Ontario Human Rights Code.

Assistive devices

Staff members are trained and familiar with various assistive devices that may be used by clients/patients with disabilities while accessing our facilities and services. The CHCN requires that clients use their own assistive devices when accessing CHCN's facilities or services.

In circumstances where a client is unable to access CHCN's services or facilities using their own personal assistive devices, it will assess service delivery or transportation on an individual basis and in accordance with the Ontario Human Rights Code.

Where the CHCN owns assistive devices, the general public must be made aware of the devices. The devices must be maintained and in good working order. Appropriate staff must be trained to use said devices.

Service animals

The CHCN has adopted welcoming attitudes and behaviours to people with service animals, and in compliance with the AODA, allows access to all public areas of the agency to service animals.

A person with disabilities is responsible for their service animal at all times. Shall the animal misbehave or bite another client or employee, CHCN may refuse access to the service animal until steps have been taken to remedy the situation.

In the event there are two or more clients with differing needs, such as a person with disabilities requiring a service animal and a client who has allergies against animals, appropriate steps will be taken to address and accommodate both parties.

Shall municipal by-laws restrict animals from certain areas (i.e. food preparation kitchen), CHCN will attempt to make alternative arrangements to accommodate the client and their service animal.

Support persons

An individual person with a disability who is accompanied by a support person is entitled to have that person accompany them to all services provided by the CHCN. Fees will not be charged for support persons for participation in CHCN programs and services. The agency will notify clients of this through a notice posted on our premises, our website and additional publications for general public consumption.

FEES

Persons with disabilities must not be charged more to access CHCN's services and facilities.

PHYSICAL ENVIRONMENT & PUBLIC SPACES

The CHCN will ensure that its public spaces and facilities be designed with accessibility features in mind.

ACCESSIBILITY STANDARDS

The Ontario Building Code includes provisions for barrier free design. The AODA and IASR also lay out standards that the CHCN must adhere to. Their purpose is to provide a minimum threshold for accessibility design. The AODA also establishes requirements for service environments and their maintenance including emergency maintenance and service disruption procedures for accessible elements in public spaces.

OBTAINING SERVICES

In the construction of fixed queue guides, service counters and waiting areas, the AODA requires the CHCN to makes these environments accessible.

EMPLOYMENT STANDARDS

The CHCN endeavors to provide an inclusive environment that fosters fair and equitable treatment and accommodation to ensure barrier-free employment. This section does not apply to volunteers and other non-paid individuals. This section sets out the employment standard requirements as governed under the AODA & IASR.

ASSESSMENT, RECRUITMENT & SELECTION PROCESS

The CHCN must post accommodations that are available to internal and external job applicants with a disability in its recruitment process. Under the Ontario Human Rights Act, the CHCN must consult with persons with disabilities who request accommodation needs due to their disability. Successful applicants will be provided with CHCN's accessibility accommodation policies in a timely manner.

EMPLOYEE SUPPORTS

CHCN employees must be made aware of provisions and policies available to support employees with disabilities and any accommodations available. CHCN must provide this information to all new employees through agreements or orientation materials. They must be redistributed to all employees when there are any policy changes that take into account a disabled employees accessibility needs.

ACCESSIBLE FORMATS

Upon request, CHCN must provide employees with information in an accessible format for purposes that include:

- Information that's needed to do one's job properly.

- Information that's generally available to the rest of the workforce.

Consultation between the employee and CHCN must occur in order to determine a format that's acceptable to the employee and meets their accessibility needs.

EMERGENCY RESPONSE INFORMATION IN THE WORKPLACE

Employees must be notified when potential or actual accessibility barriers exist that would hinder an emergency response. If an employee requires assistance to circumvent an emergency response, CHCN must receive consent to provide assistance. Such information must be reviewed when the employees accommodation needs change, they change positions, or move to a different location.

INDIVIDUAL ACCOMMODATION PLANS

If applicable, an employee may request individual accommodation plans as described in the AODA. These include, but are not limited to, receiving information in an accessible format, employee communication support, and individualized workplace emergency response information.

RETURN TO WORK

The CHCN must have a return to work policy or agreement that establishes a process for individuals returning to work following illness or injury and where disability related accommodations are required.

CAREER DEVELOPMENT, PERFORMANCE MANAGEMENT & REDEPLOYMENT

CHCN will ensure that employees with disabilities receive fair and equitable consideration and/or accommodation when career development, performance management or redeployment are considered.

REPORTING REQUIREMENTS

In accordance with the AODA, the CHCN must file compliance reports to the Province every two years. Failure to comply with this policy may result in disciplinary action through fines or dismissals and consequential reputational damage.

REFERENCE & RELATED DOCUMENTS

Accessibility for Ontarians with Disabilities Act (AODA), 2005, S.O. 2005, c.11
(AODA)

AODA, Integrated Accessibility Standards Regulation, O. Reg. 191/11

Ontario Building Code, O. Reg. 332/12

Ontario Human Rights Code, R.S.O. 1990, c.H.19

Health Protection and Promotion Act, R.R.O. 1990, Reg. 562
Food Safety and Quality Act, 2001, O. Reg. 31/05