


**CENTRETOWN COMMUNITY HEALTH CENTRE  
POLICY AND PROCEDURES MANUAL**

**ORGANISATIONAL**

<b>No:</b> ORG 1-18	<b>Title:</b> CCHC ACCESSIBILITY FOR PEOPLE WITH DISABILITIES (AODA)		
<b>Approved By:</b> Management	<b>Signature:</b> 		
<b>Approved:</b> May 2024	<b>Next Review:</b> May 2028	<b>Page:</b> 1 of 7	

**POLICY**

CCHC welcomes and encourages people with disabilities to use its services and will provide access 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 values of equity, anti-oppression, collaborative leadership and empowerment in the treatment of all individuals. CCHC will establish practices and procedures that support the accessibility standards established under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) on customer service, information and communication, employment and the built environment.

CCHC will make all reasonable efforts to meet the needs of people with disabilities. Reasonable efforts are defined as providing the best possible service within the context of: available resources, balancing the needs of people with disabilities or others who may encounter barriers to access with those of the community at large, safeguarding the health and safety of CCHC service providers.

**PURPOSE**

The purpose of this policy is to ensure that CCHC meets or exceeds the standards set by the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and its regulations. The policy applies to the delivery of all programs and services provided by the Centre.

**DEFINITION**

CCHC uses the definition of disability as per 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.

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## PROCEDURES

### 1. Commitment to Accessible Standards

1.1. CCHC will consider the individual needs of people with disabilities in delivering service by:

- Considering individual and special needs when following CCHC policies and procedures
- 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 such as wheelchairs
- 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 that 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 numbers and key contact information
- Providing opportunities for continuous improvement and regular review of accessibility policies and procedures

### 2. Principles

2.1. **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.

2.2. **Independence** – allowing a person with a disability to do things on their own without unnecessary help, or interference from others.

2.3. **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 clients, unless an alternate measure is necessary to enable the person to access services.

2.4. **Equal opportunity** – people with disabilities have an opportunity equal to that given to others to access services.

### 3. Accountability

3.1. The CCHC Board of Directors and Management Team are accountable to employees, clients, the community served and to the Government of Ontario for meeting the standards set by the AODA and its regulations.

### 4. Communication

4.1. Program staff and volunteers will communicate with people with disabilities in a way that is considerate of their needs. This includes but is not limited to print and electronic formats

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

## **5. Training for Staff and Volunteers**

5.1. CCHC will continue to train staff and volunteers to meet the needs of people with disabilities. This includes the mandatory training requirements in the AODA and its regulations.

## **6. Feedback process**

6.1. CCHC welcomes customer feedback and makes information available to all customers on how to provide feedback in accordance with Policy ORG 1-08 Client Feedback and Complaints. CCHC ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

## **7. Requests for Accommodation under the *Ontario Human Rights Code***

7.1. CCHC will continue to meet the standards set by the Ontario Human Rights Code. Where a request for accommodation is made, CCHC will strive to provide 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 unique. Accommodation will be provided unless CCHC experiences "undue hardship" as defined in the Code.

## **8. Specific Directives – Customer Service Standard**

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

### **a) Provision of Services**

In keeping with CCHC values 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's services.
- Integrate services for people with disabilities. CCHC understands that equitable access sometimes requires different treatment including separate or specialized services. However, such services will be offered in a way that respects the dignity and full participation of people with disabilities.

### **b) Service Animals**

CCHC continues to welcome service animals that are needed to assist people with disabilities. Service animals are allowed on the parts of our premises that are open to the public and third parties. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

When CCHC's staff cannot easily identify that an animal is a service animal, our staff may ask for documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A

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certificate from a registered canine behaviourist indicating that they have been approved for public access and are working as a service animal is also an acceptable means of identification.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, CCHC will do the following to ensure people with disabilities can access our services or facilities:

- explain why the animal is excluded
- discuss with the client another way of providing services.

Service animals are prohibited from accessing the Community Kitchen (where there is food) unless the animal has been tested by an appropriate animal behaviourist ( E.g. canine behaviourist) for public access which means they are safe in a food area.

**c) Support people**

CCHC welcomes people with disabilities and accompanying support people to help with communication, mobility, personal care or medical needs, or to access services. In certain cases, CCHC may require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, CCHC name 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

If this organization determines that a support person is required, there will be no fee for the support person.

**d) Assistive Devices**

People with disabilities may use their personal assistive devices when accessing our services or facilities.

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 services or facilities.

CCHC ensures that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by clients with disabilities while accessing our services or facilities.

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Training may include the demonstration and manufacture's guidelines as appropriate.

CCHC defines an assistive device as 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 wheelchair, magnifiers for reading, etc.).

**e) Training**

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and 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 of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- 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 any equipment or devices available on-site or otherwise that may help with providing services to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's services or facilities.

CCHC trains every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

**f) Employment**

CCHC notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. CCHC notifies job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

CCHC notifies successful applicants of policies for accommodating employees with disabilities when making offers of employment.

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CCHC notifies staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

CCHC 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

Where needed, we will also 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.

**g) Notice of temporary service disruption**

CCHC will provide notice of service disruptions that affect clients with disabilities, including the reason for the disruption, the length of the disruption, and a description of available alternatives, if any. In the event of an unplanned disruption, clearly posted notice will be provided as quickly as possible. The notice will be made publicly available in print format.

**h) Design of Public Spaces**

CCHC will meet accessibility laws when making major changes to public spaces. Our public spaces include service-related elements like service counters, lines and waiting areas

**i) Information and Documentation on Accessible Customer Service**

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CCHC will document its policies, practices and procedures as required by the Customer Service Standard. These documents will be posted on the Centre's website and made available in a variety of formats upon request

## REFERENCES

[Accessibility for Ontarians with Disabilities Act](#), S.O. 2005, c.11

Policy ORG 1-08 Client Feedback and Complaints