

1.0 PURPOSE

Our Home is committed to providing a respectful, welcoming, accessible, and inclusive environment in the provision of goods and services for employees, residents, and visitors. We ensure that all persons within its community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons who have disabilities.

This policy is intended to meet the requirements of the Accessibility Standards for Customer Services, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disability Act, 2005, and applies to the provision of goods and services to our customers.

2.0 SCOPE

This policy applies to the provision of goods and services at our Home.

This policy applies to employees, representatives, agents and/or contractors who deal with customers on behalf of the Home, including when the provision of goods and services occurs off the premises of the Home, such as customer visits or meetings, wherever they occur.

This policy shall be interpreted consistent with the:

- [Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 \(AODA\)](#)
- [Ontario Regulation 191/11 Integrated Accessibility Standards \(IASR\)](#)
- [Ontario Regulation 429/07 Accessibility Standards for Customer Service](#)
- [Ontarians with Disabilities Act, 2001, S.O. 2001, c. 32 \(ODA\)](#)
- [Human Rights Code, R.S.O. 1990, c. H.1](#)

The Accessibility Standards under the Act are:

- Customer Service – Provide customer service to people with disabilities in a manner that respects the dignity and independence of people with disabilities.
- Information and Communications – Create, provide, and receive information and communications in an accessible format, in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.
- Employment – Incorporate accessibility practices across all stages of employment including recruitment, selection and supporting employees with disabilities.
- Transportation – Make it easier to move around the facilities by considering the accessibility needs of people with disabilities.
- Built Environment – Make facilities and outside property more accessible to people with disabilities.

3.0 DEFINITIONS

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code 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 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 highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons’ Rights Act, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in Ontario Regulation 429/07, an animal is 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.

Service Dog – as reflected in Health Protection and Promotion Act, Ontario Regulation 562, a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in Ontario Regulation 429/07, a 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, medical needs or access to goods and services.

POLICY

In Accordance with the Accessibility Standards and Customer Service, Ontario Regulation 429/07, this policy addresses the following:

- Providing Goods & Services to People with Disabilities
- Communication
- Inclusive Meetings
- Telephone Services
- Format of Documents
- Assistive Devices
- Use of Service Animals
- Support Persons
- Notice of Service Disruption
- Employment Standards
- Customer Feedback

- Training
- Notice of Availability and Format of Required Documents
- Customer Visits and Emergency Evacuation
- Administration
- Application

Providing Goods & Services to People with Disabilities

People with disabilities will be given an equal opportunity to obtain, use and benefit from our products and services. We will make every reasonable effort to ensure that our policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring all customers receive the same value and quality
- Allowing customers with disabilities to do things their own way and at their own pace when accessing goods and services as long as this does not present a safety risk
- Using alternative methods, when possible, to ensure customer with disabilities have access to the same services in the same place and in the same manner
- Communicating in a manner that takes into account the customers disability

Communication

Our service providers will communicate with people with disabilities in ways that respectfully take into account their disabilities. We will make reasonable efforts to determine each residents needs and assist the resident to obtain tools/communication devices that will assist with communication. This includes, but is not limited to, large print, Braille, American Sign Language (ASL)/Quebec Sign Language (QSL), captioning, and videos that may be helpful to some people who have certain learning disabilities.

Inclusive Meetings

We will strive to ensure that meetings are inclusive, planned and are organized in a manner that integrates products and services that maximize the participation of persons with disabilities.

Telephone Services

We will provide accessible telephone service, including but not limited to, TTY and relay services and will train all applicable employees, volunteers and others dealing with the public on how to communicate over the telephone in clear and plain language.

Format of Documents

We will provide information or documentation, as required, in a format that takes into account the persons disability and accommodates his/her need for accessible format. Home staff and the person with a disability will agree upon the format to be used for the document or information.

Assistive Devices

People with disabilities have the right to use their own assistive devices to obtain, use or benefit from our goods and services. We will ensure that all employees, physicians, volunteers, and others dealing with the public are trained and familiar with various assistive devices that may be used by persons who have disabilities while accessing our services. In the event that the assistive device appears unsafe, we will speak with the person using the assistive device to determine whether they have access to another assistive device of their choice or, with the person's consent, attempt to identify and temporarily provide a substitute assistive device.

The following assistive devices are available on our premises:

- wheelchairs

- walkers where
- paper and pens for handwritten notes
- large print, digital audio format,

Use of Service Animals

People with disabilities who are accompanied by a service animal have the right to access our Home and keep the service animal with them while accessing our services. We will also ensure that all employees, volunteers, and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

The service animal is to remain with the owner at all times. If the resident is unable to manage the service animal, his/her designated support person for the animal is to be notified to come to the Home and assume responsibility for the animal during the transition period. The service animal may be brought to the Home to visit and to resume its duty as soon as possible.

Responsibilities

Owner:

- a) the animal's control and stewardship, i.e., the animal's behaviour, care, supervision, and wellbeing
- b) make available training school and up-to-date immunization records, if requested
- c) make the animal clearly identifiable/recognizable (e.g., identification card)
- d) harness or jacket with markings of the training school)

Area charge person:

- a) inform staff about the role of the service animal and how to interact appropriately with the resident and the animal
- b) notify other residents of the service animal's presence and address any concerns (e.g., allergies)
- c) discuss with the owner and staff the responsibilities for feeding, handling, and cleaning issues

Staff (including physicians):

- a) if uncomfortable providing care to a resident with a service animal, finding an alternative professional who will provide that care and document this in the resident's health record
- b) **not** to separate or attempt to separate a resident from his/her service animal without the owner's consent
- c) **not** to touch a service animal or the person it assists, without permission
- d) **not** to pet, or make noise at, a service animal as this may distract the animal from the task at hand
- e) **not** to feed a service animal as it may have specific dietary requirements or may become ill from unusual food or food at an unexpected time
- f) **not** to deliberately startle a service animal
- g) while performing professional health related responsibilities, **not** to provide care for the service animal. This care includes, but is not limited to, feeding, toileting, exercising and interacting with the animal.

Eviction or Exclusion of a Service Animal

Eviction or exclusion of a service animal may only occur for reasons that are **demonstrable**, not speculative. Assumptions or speculations about how the animal is likely to behave, based on experience with other animals, are not valid. If another person complains about the presence of a service animal (because of allergies, fear, or other reasons not related to the animal's demeanor or

health), the person with objections to the animal should be consulted and provided with alternatives that do not compromise access to service being sought. Each situation is to be considered individually and in consultation with the owner. Discussion with Head Office Consultants is recommended in difficult situations.

A service animal may be evicted, excluded, or separated from its owner **only**:

- a) if the animal's **actual** behavior or health poses a direct threat to the health or safety of others, and/or
- b) if contraindicated by the attending physician for **sound** medical and/or safety reasons.

These circumstances and rationale must be documented in the resident's health record. If a resident must be separated from the service animal while in the Home:

- a) the arrangements the resident has made for the supervision or care of the animal during this period of separation must be obtained from the resident, and
- b) appropriate arrangements must be made to address the resident's needs in the absence of the service animal.

Safety

If any staff, visitor, or resident sustains an injury from a service animal, a safety report must be completed detailing the name of the injured, circumstances, and nature of the injury. All bites should be reported, during business hours from 8:30 a.m. to 4:30 p.m., Monday to Friday, to Public Health.

Support Persons

People with disabilities who are accompanied by a support person have the right to have that support person accompany them while accessing services at the Home and may accompany them in all areas except where excluded by law for health and safety reasons. Where a support person is excluded by law, we will explore alternative ways for the person with disabilities to access its services. Notification will be given in advance of any fees or charges payable by a support person accompanying a person with a disability seeking services at our Home.

Responsibilities

Charge person: Inform staff about the role of the support person and appropriate interaction with the resident and the support person.

Staff and physicians:

- a) not to separate, or attempt to separate, a resident from his/her support person without the resident or resident designee's consent unless there are actual sound medical reasons for the separation
- b) if, for any reason, he/she does not agree to provide care to a resident with a support person, to find an alternative professional who will provide that care and to document this in the resident's health record

Waiver of Rights

If the resident provides consent for the support person to be present as it relates to personal health information being shared, the health care provider is to document this consent in the resident's health record.

Control & Stewardship

The individual with a support person is responsible for control, stewardship, and wellbeing.

Eviction or Exclusion

A support person may only be evicted, excluded, or separated from the resident if:

- a) his/her **actual** behaviour poses a direct threat to the health or safety of others,
- b) the attending physician has **sound** medical reasons.

These circumstances and rationale must be documented in the resident's health record.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption in the services used by people with disabilities, we will post alternative format notices in conspicuous locations, including but not limited to, public entrances, nursing stations, and reception desks.

In accordance with the Accessibility Standards for Customer Service under the AODA, we will provide notice to the public when there is a temporary disruption to services. This procedure will strive to ensure that notification of planned or unexpected, temporary disruptions to services that are usually used by persons with disabilities will include information about the reason for the disruption, expected duration and a description of alternative facilities or services, if available. Temporary service disruptions affecting the provision services will be communicated as follows:

- a) For physical facility service interruptions in access to washrooms, elevators, doors, entrances, corridors, stairwells, internal and external walkways and driveways, notices will be posted at the location of the service disruption (such as on the door of the elevator or washroom).
- b) For service, or program cancellations due to severe weather, disease outbreak and mechanical difficulties (such as power shutdowns), notices will be posted on the intranet and communicated by a general outgoing message from the main switchboard.
- c) All notices will include information about the reason for the disruption, the expected duration, when known, and a description of alternative facilities or services, if available.
- d) Notices communicating a temporary disruption to services will be in:
 - a. plain language
 - b. Arial style
 - c. at least 24-font size.
 - d. high contrast colours such as black and white and easy to read
- e) Notices will be posted in conspicuous locations, including but not limited to, public entrances, information, and reception desks, on the website at and any other reasonable location under the specific circumstances.

Employment Standards

We are committed to fair, equitable and accessible employment practices. The Home shall identify, prevent, and remove barriers across the employment life cycle for persons with disabilities. The Employment Standards requirements only apply to paid staff.

1. Accessible Formats and Communication Supports for Employees

Upon an employee's request, the Home shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is:

- a) Specifically needed in order to perform the employee's job.

b) Generally available to employees in the workplace.

2. **Document Individual Accommodation Plans for Employees** - The Home shall review its existing employee accommodation processes to ensure the accommodation plan includes the following elements.

- a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- b) The means by which the employee is assessed on an individual basis.
- c) The manner in which the Home can request an evaluation or assessment by an outside medical or other expert, at the home's expense, to assist the Home in determining if the accommodation can be achieved and, if so, how the accommodation can be achieved.
- d) The manner in which the employee can request the participation of a representative from their bargaining agent or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- e) The steps taken by the Home to protect the privacy of the employee's personal information as it relates to the accommodation plan.
- f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- g) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to a visible or invisible disability.
- h) The manner in which the denial of an individual accommodation plan will be provided to the employee.

Individual accommodation plans shall include, if requested, all information regarding accessible formats and communication supports provided by the Home. They should also include, if required, individualized workplace emergency response information.

3. **Employee Supports** - The Home shall inform all employees of the policies used to support employees with disabilities, including policies on the provisions of job accommodations that take into account an employee's accessibility needs due to a disability.

The Home shall provide this information to new employees as soon as practicable after they are hired and communicate updated information to all employees whenever there is a change to existing accommodation policies on the provision of job accommodations. The Home shall provide this information in a manner that takes into consideration an employee's accessibility needs due to disability.

4. **Performance Management, Career Development, and Redeployment** - The Home shall take into account the accessibility needs of employees with disabilities and individual accommodation plans when managing performance, when providing career development and/or advancement opportunities or when redeploying the employee.

The Home shall review and take appropriate steps to prevent and remove barriers that pertain to employment, and upon employment, during career development and redeployment.

5. **Recruitment** - The Home shall notify employees and the public of the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants selected for an interview and/or testing shall be notified of availability of accommodations. The Home shall consult with the job applicants requesting accommodations in a manner that takes into account the applicants' disabilities. Successful applicants shall be notified of the Home's policies for accommodating employees with disabilities as part of its offer of employment.
6. **Return-to-Work Process** - The Home shall review its return-to-work process and ensure it addresses the needs of employees who have been absent from work due to a disability and/or who require disability-related accommodation in order to return to work.

This process shall include the steps to be taken to facilitate the return to work of employees whose absence was related to their disability. Documented individual accommodation plans shall be part of the process.

7. **Workplace Emergency Response Information** - If an employee's disability is such that individualized workplace emergency response information is necessary and the Home is made aware of the need for accommodation, this information shall be documented.

This documentation shall be provided to the person designated to provide assistance to the employee during the emergency, with the employee's consent.

The information shall be reviewed when the employee moves to a different department or job, when the employee's overall accommodation needs and accommodation plans are reviewed or when the Home reviews its organizational emergency response plan.

Feedback Process

The feedback process specifies the actions that we will take if a resident, visitor, or employee expresses a concern about access to goods and services to ensure service equity. All feedback will be reviewed and forwarded to the Administrator and Assured Care Consulting for follow-up.

Receiving, Responding & Taking Action on any Concerns

All feedback may be provided in person, by telephone, in writing, by e-mail, on disk or by another method. Feedback including questions, concerns, comments, or compliments about access will be followed up within two business days of receiving the information. All information will be treated as confidential until consent to disclose is provided, unless required by law.

Training

We will provide training to all employees, physicians, volunteers, and others who deal with the public or other third parties on our behalf, and all those who are involved in the development and approval of customer service policies, practices, and procedures.

1. **Training** – We shall deliver training as it pertains to persons with disabilities.
 - a. Training shall be provided to all employees, volunteers, and third-party service providers.
 - b. Training shall be provided in a way that best suits the duties of employees, volunteers, and third-party service providers.

- c. Training shall occur as soon as possible after an employee is hired or when changes are made to accessibility policies.
- d. Training shall also occur when an employee moves to another role which warrants additional accessibility training.
- e. Training records shall be kept, including the dates when the training has been provided, content of the training and number of individuals to whom the training was provided.

Application

This policy applies to all members of our community including employees, students, volunteers, residents, families, visitors, physicians, researchers, suppliers, contractors, and any other person who may interact with the public on behalf of our Home.