

<b>Section:</b> Human Resources	<b>Policy:</b> Accessibility
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<b>Approved By:</b> Cate Melito	<b>Signature:</b> 

## Customer Service

### Providing Goods and Services to People with Disabilities

- GBACHC is committed to excellence in serving all customers including people with disabilities and will carry out our functions and responsibilities in the following areas as required under Bill 103, Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Customer service Standard. It is the policy of GBACHC to strive at all times to provide its services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services, in the same place and in a similar way as other patients/ clients.

### Communication

- We will communicate with people with disabilities in ways that take into account their disability.
- We will train staff who communicate with patients/ clients on how to interact and communicate with people with various types of disabilities.

### Telephone Services

- We are committed to providing fully accessible telephone service to our patients/ clients. We will train staff to communicate with patients/ clients over the telephone in clear and plain language and to speak clearly and slowly.
- We will offer to communicate with patients/ clients by email if communication is not suitable to their communication needs or is not available.

### **Assistive Devices**

- We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that our staff is trained and familiar with various assistive devices that may be used by patients/ clients with disabilities while accessing our services (e.g. wheelchairs, walkers etc.).

### **Billing**

- We are committed to providing accessible invoices to all of our patients/ clients. For this reason, we will answer any questions patients/ clients have about the content of the invoice in person, by telephone or email.

### **Use of Service Animals and Support Persons**

- We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will ensure that all staff, 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.
- We are 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 GBACHC 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 their support person while on our premises (please refer to policy 13.3).

### **Notice of Temporary Disruption**

- GBACHC will provide patients/ clients with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.
- The notice will be placed at all public entrances and service counters on our premises (please refer to policy 13.4)

### **Training for Staff**

- GBACHC will provide training to all employees, volunteers, students and others who deal with the public on their behalf, and all those who are involved in the development and approval of customer service policies, practices and

procedures. Training will occur during the employee, volunteer or student orientation process.

- Training will include the following:
  - The purpose of the Accessibility for Ontarians with disabilities Act, 2005 and the requirements of the customer service standard.
  - 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 support person.
  - How to use wheelchairs, walkers and all other devices that are relevant to the employee's area of work.
  - What to do if a person with a disability is having difficulty accessing GBACHC's services.
  - GBACHC's policies, practices and procedures related to the customer service standard.
- REFERENCES: Bill 103, Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Customer Service Standard
- Applicable staff will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

### **Feedback Process**

- The ultimate goal of GBACHC is to meet and surpass patient/ client expectations while serving those with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.
- Feedback regarding the way GBACHC provides services to people with disabilities can be delivered by:
  - In writing attention to: GBACHC Accessibility Coordinator
  - By email to: [kkillens@gbchc.com](mailto:kkillens@gbchc.com)

- By phone: 519-238-1556 x276
- In person by asking for the GBACHC Accessibility Coordinator or designate.
- Or by using other methods as agreed upon by the individual and GBACHC.
- All feedback will be directed to the Accessibility Coordinator. Patients/ Clients can expect to hear back within 30 days from receipt of request.
- Complaints will be addressed according to complaint categories already established in the GBACHC Complaints/ Compliments Policy (Board Policy BV-10)

#### **Modifications to this or other policies**

- We are 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 without considering the impact on people with disabilities.
- Any policy of GBACHC that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

#### **Questions about this or other Accessibility Policies**

- This policy exists to achieve service excellence to patients/ clients with disabilities. If anyone has a question about this or any other policy as it relates to Accessibility or if the purpose of the policy is not understood, an explanation will be provided by the Accessibility Coordinator 519-238-1556 x276 or [kkillens@gbchc.com](mailto:kkillens@gbchc.com)

***\*\* All policy and procedure documents related to Accessibility are available to the public upon request in a format agreed upon by the person with a disability. All documentation related to Accessibility will posted on the internet and can be accessed through our website [www.gbachc.ca](http://www.gbachc.ca) – Your Accessibility. Please follow the feedback process should paper copies or larger font sizes need to be requested\*\****

## Service Animals

### Preamble

- Service animals are animals specifically trained to assist people with disabilities in their activities of independent living (please refer to policy 13.1 Customer Service – Providing Services to People with Disabilities). They are not considered to be pets but rather an auxiliary aid similar to the use of a cane, crutch or wheelchair.

### Policy

- Service animals are permitted within the Grand Bend Area Community Health Centre (GBACHC) in areas commonly accessed by the public. A patient/ client accompanied by a service animal is not required to disclose the nature of their disability. In areas where service animals are not permitted by law, GBACHC staff and affiliates will provide alternate means of assistance to ensure that the person still has access to our services.
- As per the Accessibility for Ontarians with Disabilities Act, 2005 – O.Reg 429/07 section 4 (Use of service animals or support persons), an animal is a service animal for a person with a disability:
  - a) If it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
  - b) If the person provides a letter from a physician or nurse practitioner confirming that the person requires the animal for reasons relating to the disability.

### Examples of service animals include:

- A guide animal, trained by authorized vendors to service for mobility individuals who are visually impaired and/or blind.
- A hearing animal, trained to alert a person with significant hearing loss or who is deaf when a sound occurs, such as a knock on the door or fire alarm
- Special skills animal, trained to assist a person who has a mobility or health disability. Duties may include carrying, fetching, opening doors, ringing doorbells, activating elevator buttons, steadying a person while walking, helping a person up after a fall, emotional support etc. These animals are sometimes called assistance animals.

- A seizure response animal is trained to assist a person with a seizure disorder. The animal's service depends on the person's needs. The animal may go for help, or may stand guard over the person during a seizure. Some animals have learned to predict a seizure and warn the person.
- A companion animal or emotional support animal is an animal that assists persons with psychological disabilities. Emotional support animals can help alleviate symptoms of depression, anxiety, stress and difficulties with social interactions, allowing individuals to live independently and fully use and enjoy their living environment.

### **Supervision**

- The service animal must be supervised and the handler or designate must retain full control of the animal at all times.

### **Awareness training**

- GBACHC staff should be aware of the following while caring for a patient who is accompanied by a service animal:
  - Do not pet or touch a service animal. Petting a service animal when the animal is working distracts the animal from the task at hand.
  - Do not feed a service animal. The service animal may have specific dietary requirements. Unusual food at an unexpected time may cause the animal to become ill.
  - Do not deliberately startle a service animal. Do not separate or attempt to separate a patient/ client from his or her service animal. Avoid making noises at the animal (whistling, clapping etc.)
  - Converse with the owner/ handler, not the animal. Avoid eye contact with the animal.
  - Avoid initiating conversation about the service animal, the patient/ client's disabilities or other service animals one has known. If you are curious you may ask if the owner/ handler would like to discuss it, but be aware that many persons with disabilities do not care to share personal details.
  - Remember, not all disabilities are visible. The nature of the person's disability is a private matter, and you are not entitled to inquire for details.

- Service animals may wear specialized identifiable harnesses or vests. All service animals/ users have identification cards.
- Staff caring for the patient/ client shall make provisions for the service animal to go outside and relieve itself.

## **Support Persons**

### **Policy**

- People with disabilities who are accompanied by a support person have the right to have access to that support person while at the Centre to assist them with communication, mobility, personal care or medical needs to enable access to services provided by the Grand Bend Area Community Health Centre (GBACHC).
- A support person may be a regulated health professional or unregulated person such as a family member, volunteer or friend.
- GBACHC reserves the right to limit a support person's access to their charge on the basis of medical or safety considerations. For example, if a support person has a communicable illness and it is likely that they will put others at risk due to their illness, they may be denied access to their charge or to areas of the centre.
- If a person with a disability is deprived of access to their support person for this reason, the Centre will assume responsibility for basic care of the individual with a disability. If possible, situations requiring the separation of individual and support person will be discussed with the individual in advance and appropriate measures taken.
- The centre may also require the presence of a support person if it is deemed by staff that a significant amount of risk is incurred by an individual with a disability who is attempting to access centre services without assistance.

## **Notice of Service Disruption**

### **Policy**

- It is the policy of GBACHC in compliance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) Customer Service Standard to provide timely notification to its patients, staff and the public in the event of a service disruption

where persons with disabilities usually use particular facilities of services of the provider.

### **Procedure**

- In the event of a service disruption to the GBACHC elevating device the following procedure will immediately be taken into effect:
  1. GBACHC Maintenance staff will complete a notice of service disruption form (see appendix A). The notice must be completed in full and include all of the following information:
    - The date of the disruption
    - The anticipated duration of the disruption (including start time and anticipated time the disruption will be resolved).
    - Complete listing of alternate means of access and where they are located.
  2. GBACHC Maintenance staff will then post copies of the completed service disruption form in all the following areas:
    - On the elevator door – both upper and lower level access doors.
    - At the front entrance
    - At front reception
  3. GBACHC Maintenance will communicate the notice of disruption including anticipated duration and alternate means available for accessing the building to the following people/ departments:
    - Front registration: MOA staff will verbally communicate to patients and public who may be coming to departments that require the use of the elevator that there is a disruption. They will provide directions for the alternate means of access.
    - All Departments that may be affected by the disruption: Every attempt is to be made to notify the department in person. If people from the respective departments are not available in person then a voice mail with details of the disruption is to be left on the department voicemail.



- Diabetes Education (3 extensions)
  - Social Work (2 extensions)
  - Community Nutrition
  - Health Promotion/ Partnerships
  - One Care, etc.
4. In the event of an extended disruption each department will exercise at their discretion based on patient caseload whether or not clients will be individually notified about the disruption and the alternate means of available for accessing the services.

#### **Procedure for Completion of Service Disruption**

- Upon completion of the service disruption the Maintenance department will be responsible for the following:
  - Removing all posted notices of the service disruption
  - Informing all relevant departments that the service disruption is now over as outlined in set 3b (see above)

#### **Language and Translation Resource List**

- The Grand Bend Area Community Health Centre is committed to meeting the needs and ensuring the safety of all people receiving health care services. It is an essential aspect of risk management to guarantee that health care procedures, instructions, information, etc. are clearly communicated and understood. This will enable individuals to make informed decisions about their health care in conjunction with health care professionals.
- Every effort will be made to establish effective communication and ensure equal access to health care services by all individuals.
- A list of interpreters for languages used in the community (spoken and sign) will be generated, where possible. This list will be kept in the Primary Care Department to facilitate access at any time of the day and on weekends and updated as required.

- Telehealth will also provide translation services.

**For those individuals who are deaf or hard of hearing:**

- Determine which method the person would prefer to use to communicate
  - Through a family member/friend;
  - Written format;
  - Verbal (lip reading); or
  - The use of a language interpreter.
- If using an interpreter, consult the list in the Primary Care Department or contact the Canadian Hearing Society (London) at 1-519-667-3325 to arrange for a qualified signing interpreter. Pre-booking appointments for individuals who require interpreters should be encouraged.

***Note: the right to access is supported by a 1997 Supreme Court ruling, which asserts that it is the Centre's responsibility to provide and pay for the services of sign language interpreters.***

**Accessible Information**

- GBACHC will make all written information and other forms of communication accessible, upon request. If a person with a disability asks for accessible information or requires communication supports, the Accessibility Coordinator, and all GBACHC staff, will work with them to determine how to meet their needs. Accessible information will be provided in a timely manner.
- In some cases, it may not be possible to provide accessible information:
  - If the information cannot possibly be converted to an accessible format. In this case, an explanation will be provided along with a short summary of the information.
  - If the information originates from another organization
  - If the information is not controlled by GBACHC

- If the information is found on products or product labels
- GBACHC will provide the following information in an accessible format, where possible, to clients, visitors, the public and staff:
  1. Emergency and Public Safety Information:
    - Emergency plans and procedures;
    - Maps, warning signs and evacuation routes
    - Information about alarms or other emergency alerts
  2. Feedback Processes for Employees and the Public:
  3. Employee Information
    - Any information that employees need to perform their jobs;
    - General information that is available to all employees at work;
    - Information about emergency procedures
  4. Other Public Information:
    - All print documents and information provided to the public on websites and handheld devices, where possible

## **Accessible Workplace**

### **Hiring Process**

- GBACHC is an equal opportunity employer and will inform employees and the public that the needs of persons with disabilities will be accommodated in the hiring process. This information will be communicated in the following ways:
  - Posted on the GBACHC website
  - Included in job postings

- Workplace Information will be provided to employees, upon request and where possible in accordance with GBACHC policy 13.6 above. Employees may request that information be provided in an accessible format in a number of ways as listed in the feedback process under GBACHC policy 13.2 above.

### **Talent and Performance Management**

- GBACHC will consider the needs of any employee with a disability during the performance management process by:
  - Making documents available in accessible formats
  - Providing feedback and coaching in a way that is accessible
  - Providing the accommodations needed to successfully learn new skills or take on more responsibilities

### **Communication of Accessibility Policies**

- GBACHC will inform all employees of the policies in place to support people with disabilities. New employees will be informed at the time of hire through the New Employee Orientation Process. Any changes to these policies will be communicated. The method(s) used to communicate GBACHC policies include:
  - Newsletter
  - Email
  - Website
  - Staff Meetings
  - Individual conversations

## Accommodation Plans

GBACHC is committed to accommodating employees with disabilities and will use the following process to meet employee accommodation needs.

### Recognize the need for accommodation:

- Accommodation can be requested by the employee
- Identified by the employee's manager or hiring manager

### Gather relevant information and assess individual needs:

The employee is an active participant in this step

1. Information will be collected on the employee's functional abilities, not the nature of the employee's disability
  - The employee's personal information, including medical information, is kept secure and dealt with in a confidential manner. It will only be disclosed to individuals who need it to perform the accommodation process.
2. The employee and his/her manager will work together to find the most appropriate accommodation
  - A medical or other expert may be engaged, at GBACHC expense, to help determine if/ how the employee's needs can be accommodated
  - The employee may ask a workplace representative to participate in the process

### Written individual accommodation plan:

- After identifying the most appropriate accommodation(s), the details will be documented in a written plan, including:
  - What accommodations will be provided
  - How to make information accessible to the employee, including accessible formats and communication supports
  - Employee emergency information and/or emergency response plan (if applicable)

- When the plan will be reviewed and updated
- The manager will give the employee a copy of the individual accommodation plan, or written reasons for denying accommodation, in an accessible format (if required)

**Implement, monitor & update the plan:**

- After implementing the accommodation plan, the employee and his/her manager will monitor and review the plan to ensure that it is effective. Formal reviews and updates will take place on the mutually agreed upon, predetermined schedule in the employee's accommodation plan. If the accommodation is no longer appropriate, the employee and manager will reassess the situation (Step 2) and update the plan.
- The accommodation plan will also be reviewed and updated if:
  - The employee's work location or position changes
  - The nature of the employee's disability changes
- A sample individual accommodation plan can be found in GBACHC Human Resources Policies section 14.0 Appendices – Appendix 4