

Accessibility	Section: Introduction Number: 0.7
Approved: November 26, 2012	Page: 1 of 9
Revised: November 4, 2013 January 15, 2024	All employees, students and volunteers

# POLICY:

Community Living Oakville (CLO) strives at all times to provide goods and services in a way that respects the dignity and independence of persons with disabilities. CLO is committed to ensuring that people with disabilities are able to access our services in the same place and similar way as those without disabilities. CLO will comply with all aspects of the Accessibility for Ontarians with Disabilities Act (AODA) and the Human Rights Code and strives to ensure that all locations owned or operated by CLO provide barrier free services, supports, environments and employment. CLO recognizes that the key principals of accessibility are independence, dignity, integration and equality.

CLO will maintain its accessibility policies in a written format. They will be available to the public and will be provided in an accessible format if it is requested.

CLO will maintain its multi-year accessibility plan. The plan will be reviewed and updated at least once every five years. It will show our organization's commitment to removing barriers and preventing new ones. Our multi-year accessibility plan will be available to the public and provided in an accessible format when requested.

## Background

The AODA was passed by the Ontario legislature with the goal of creating a barrier-free Ontario by 2025. Under the AODA, the government will develop and enforce specific standards to improve accessibility across the province. The standards will set requirements in a number of key areas. Five sets of standards are planned, including:

- 1. Customer Service
- 2. Transportation
- 3. Information and Communication
- 4. Built Environment
- 5. Employment



## **PROCEDURES:**

## CUSTOMER SERVICE

The Accessibility Standards for Customer Service, Ontario Regulation 429/07, (O.Reg 429/07) sets out specific and general requirements to ensure goods and services are provided in ways that are accessible to people with disabilities. O. Reg 429/07 does not set accessibility requirements for the goods themselves, but rather the way in which they are provided to customers.

## Definitions

#### Alternative Format

Any other ways of publishing information beyond traditional printing (i.e. large print, audio format, etc).

#### Assistive Device

Is 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. Personal assistive devices can include wheelchairs, hearing aids, white canes or speech amplification devices.

## Customer

Any person who receives goods or services.

#### Disability

Definition of disability found in the Ontario Human Rights Code:

- (a) 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
- (b) A condition of mental impairment or a developmental disability



- (c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- (d) A mental disorder, or
- (e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

#### Employee

Any person who deals with members of the public or other third parties on behalf of CLO, whether the person does so as an employee, agent, volunteer or otherwise.

#### Person with a Disability

Those individuals with a disability as defined under the Ontario Human Rights Code.

#### Service Animal

Any animal individually trained to do work or perform tasks for the benefit of a person with a disability.

#### Support Person

Any person, whether a paid professional, volunteer, family member or friend, who accompanies a person with a disability in order to help with communication, personal care or medical needs or with access to goods or services.

## Accessible Customer Service for People Supported by CLO

- CLO will include any supports that a person requires to access services in their Individual Support Plan (ISP)
- All people receiving service from CLO will have access to the assessments, assistive devices and services to provide them with the most effective means of communication available to them
- Access to services will be provided to people in a manner that respects their religious affiliation, cultural diversity, sexual orientation and heritage
- Any barriers to accessibility will be noted in the ISP along with the steps taken to resolve the issue
- CLO will maintain a list of renovations required to remove barriers to accessibility for people receiving services and will complete renovations as funds become available
- All intervention plans and interventions will consider the accessibility needs of the person



- Any movement of people within CLO or outside of the Agency will consider the accessibility needs of the person
- CLO will consider the following barriers when reviewing accessible services:
  - 1. Structural Barriers
  - 2. Environmental Barriers
  - 3. Communication Barriers
  - 4. Attitudinal Barriers
  - 5. Financial Barriers
  - 6. Transportation Barriers
  - 7. Language Barriers

## Accessible Customer Service for Persons Seeking Goods and Services at CLO

#### How to Interact and Communicate with People with Various Types of Disabilities:

- To ensure the best possible customer service CLO will communicate with people with disabilities in a manner that takes into account their disability
- Employees will ask people how best to communicate with them (i.e. written format, telephone, email, large print, interpreter)

People who have both a vision and hearing loss:

- Person may have some degree of both hearing and vision loss
- Person may be accompanied by an intervenor, if so speak directly to the person, not the intervenor

People who have hearing loss:

- Attract the person's attention before speaking with a gentle touch on the shoulder or wave of the hand
- Make sure the area is well lit where the person can see your face to read your lips
- If the person uses a hearing aid, reduce background noise or move to a quieter area
- If needed ask if another method of communication would be easier i.e pen and paper

People who have vision loss:

- Vision loss can restrict a person's ability to read, locate landmarks or see hazards
- Some people may use a guide dog or a white cane
- Don't assume the person can't see you, some people with low vision have some sight
- Identify yourself when you approach the person and speak directly to them
- Ask if the person would like you to read any printed material out loud to them

# **Policy and Procedure Manual**



- When providing directions or instructions be precise and descriptive
- Offer your elbow to guide them is needed

People who have physical disabilities:

- If having a longer conversation with a person who uses a scooter or wheelchair sit down so you can make eye contact at the same level
- Don't touch items or equipment without permission
- If you have permission to move a person's wheelchair don't leave them in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors

People with learning disabilities:

- Refers to a variety of disorders such as dyslexia that affect how a person takes in or retains information
- May become apparent when a person has difficulty reading material or understanding information
- Be patient, people may take longer to process information, understand and respond

People with speech or language impairments:

- Some conditions may make it difficult for a person to pronounce words or may cause slurring
- People may use a communication board or other assistive devices
- Don't assume a person with a speech impairment has another disability
- When possible ask questions that can be answered with yes or no
- Be patient, don't interrupt or finish the person's sentences

People who have a mental health disability:

- Mental health issues can affect a person's ability to think clearly, concentrate or remember things
- Mental health disability is a broad term for many disorders that can range in severity
- Some people may experience anxiety due to hallucinations, mood swings, phobias or panic disorder
- Treat people with a mental health disability with the same respect, dignity and consideration as anyone else
- Be confident, calm and reassuring
- If a person appears to be in crisis ask them to tell you the best way to help

People with a developmental disability:

• Don't make assumptions about what a person can do or understand



- Use plain language
- Provide information one piece at a time

## How to Interact with People Who Use Assistive Devices:

- CLO will ensure staff are trained and familiar with any assistive devices that may be used by individuals with disabilities
- Don't touch or handle any assistive device without permission
- Don't move assistive devices or equipment such as canes and walkers out of the person's reach
- Let the person know about any accessible features in the immediate environment that are appropriate to their needs i.e. accessible washrooms

## How to Interact with People Who Require the Assistance of a Service Animal:

- CLO welcomes people with disabilities and their service animals
- Employees will be trained on how to interact with individuals with service animals as required
- People with vision loss may use a guide dog but there are other types of service animals as well
- Hearing alert animals help people who have hearing loss
- Service animals can be trained to alert a person to an oncoming seizure
- A service animal is not a pet, it is a working animal
- Avoid touching or addressing service animals, they have to remain alert at all times
- Avoid making assumptions about the animal, if you are not sure if the animal is a pet or service animal, ask the person

## How to Interact with People Who Require the Assistance of a Support Person:

- CLO welcomes any support person that may accompany a person on CLO premises or functions
- A support person can be a paid support worker, a volunteer, a family member or a friend
- A support person may help the person with communicating, mobility, personal care or medical needs
- If unclear as to who the customer is and who the support person is, ask
- Speak directly to the person and not their support person
- CLO will notify customers in advance if a fee will be charged for any support person at any CLO function or activity

## Notice of Temporary Disruption:

• Individuals will be notified of any planned or unplanned disruptions of services



- Notice may take the form of phone messages, emails, letters, posted notices, website or in person
- The notice will include the following information:
  - Type of disruption
  - Reason for disruption
  - Anticipated duration of disruption
  - Alternative service locations, if any

## TRANSPORTATION

The Transportation Standards apply to public transportation (bus, train, subway, etc.). This standard is not applicable to CLO.

## INFORMATION AND COMMUNICATION

Information can take various methods including:

- Emergency and public safety information
- Feedback processes for employees and the public
- Employee information including information needed to perform their job, general information or emergency procedures
- Other public information provided to the public on websites and/or handheld devices

When providing information to, or communicating with, a person with a disability, we will provide, on request, the information and communication in an accessible format or with a communication support. We will work in consultation with the person with the disability to provide them with the information in a manner that takes into account the person's disability.

## Accessible Documentation

CLO communicates with the public through various methods including our website, social media, email and presentations. Upon request CLO will work with the person requesting an accessible format to determine their needs and the appropriate format or support (within CLO's capacity) to provide the information.

## Feedback Process:

- CLO welcomes comments and feedback on how our services are provided
- People who wish to provide feedback on how CLO provides services to people with disabilities can do so in person, by mail, by email or voice message to the manager of the service area and the director of services



- Surveys and questionnaires are distributed to families, individuals and staff to provide opportunities for feedback
- Contact information is available on the website <u>www.oakcl.org</u> or by calling (905) 844-0146
- Complaints will be addressed according to CLO's complaints process

#### Accessible Website

CLO's website and web content conform to WCAG 2.0 Level AA standard for accessibility.

#### **BUILT ENVIRONMENT**

#### Design of Public Spaces

Community Living Oakville will incorporate accessibility requirements under the IASR when building or redeveloping a public space identified under Accessibility Standard for the Design of Public Spaces.

#### EMPLOYMENT

CLO is committed to fair, equitable, inclusive, and accessible employment practices. CLO will:

- Provide accommodation throughout the hiring process (pre-screening, recruitment, selection, and onboarding)
- Endeavour to identify and reduce or eliminate systemic barriers to accessible employment and growth opportunities
- Inform employees of policies supporting employees with disabilities and provide this information to new employees during onboarding
- Provide updated information on accommodations policies to employees when changes occur and consult with employee to determine suitability of format or support
- With the employee, develop individual accommodation plans and return-towork plans for employees with a disability (see Health and Safety Policy 3.3 Early and Safe Return to Work)
- With the employee, develop an Individualized Workplace Response Plan outlining the emergency response information or protocols for the employee when requested
- Ensure Performance Feedback takes into account the accessibility needs of employees with a disability



## Training:

- CLO provides services to individuals with developmental disabilities and provides training for employees on various types of disabilities and use of assistive devices, training provided will be appropriate to work duties
- All employees, students and volunteers will be trained on the Accessibility Policy and the AODA and the requirements of the Customer Service Standards at the time of hire and will review the policy and any revisions annually thereafter
- CLO provides training on the AODA Information and Communication Standards to employees and volunteers involved in developing or disseminating information internally or externally on behalf of the organization
- HR will maintain mandatory training records and records will be available upon request

#### Exclusions:

• The Accessibility for Ontarians with Disabilities Act, O. Reg 429/07 shall not apply during any period declared as a "State of Emergency" as defined under the Emergency Management and Civil Protection Act

#### **Review and Changes to Policies:**

- No changes will be made to this or any other policy before considering the impact on people with disabilities
- Any policy of CLO that does not respect and promote the dignity and independence of people with disabilities will be modified or removed
- This policy will be reviewed annually to ensure compliance with the legislation and reporting requirements

## Notice of Availability of Documents:

- CLO's Accessibility Policy will be posted on the CLO website
- A copy of the required documents will be provided to anyone who asks for them in their preferred format within ten (10) business days
- A request for these documents can be made by contacting Human Resources