

# Community Living St. Catharines

## Adult Supports Operational Procedure Manual

Section

### Employment Practices

Procedure

### Accessibility

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Page

1 of 8

## TABLE OF CONTENTS

### Section One ACCESSIBILITY POLICY

	Page
Statement of Organizational Commitment	2
Information and Communication	2
• Accessible Documentation	
Feedback Processes for Employees and the Public	3
Accessible Website	3
Employment	4
Documented Individual Accommodation Plans	4
Return to Work Process	5
Training for Employees	5
Design of Public spaces	5
Providing Goods and Services to People with Disabilities	6
Use of Support Persons and Service Animals	6
Notice of Temporary Disruption	7
Feedback Process	7
Evaluation	8
Questions about this Policy	8
References	8
Section Three CLSC MULTI-YEAR ACCESSIBILITY PLAN	Addendum

**STATEMENT OF ORGANIZATIONAL COMMITMENT**

In fulfilling our mission, Community Living St. Catharines (CLSC) strives at all times to provide its goods and 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 goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers. Whether a person's disability is apparent or not, everyone shall be treated with courtesy, made to feel welcome, and have their need for accommodation respected whenever they interact with our agency.

CLSC 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.

CLSC 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.

**SCOPE**

This policy and procedure applies to all employees, volunteers and the Board of Directors while working or volunteering on CLSC property.

**1. Information and Communications**

Information can take various methods including: 1) emergency and public safety information; 2) feedback processes for employees and the public; 3) employee information including information needed to perform their job, general information or emergency procedures; and 4) 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.

**a) Accessible Documentation**

CLSC has a number of methods used to communicate with the public. Examples include: pamphlets, website, Facebook, business cards, email and presentations. It is imperative that CLSC provides accessible formats when communicating with the public and does so in a timely manner. Upon request, CLSC will work with the person requesting an accessible format to determine their needs and the appropriate format or support (within CLSC capacity) to provide the information.

In some instances CLSC may need to print the document in an accessible format (see recommended format) or send an electronic file through email. Note: presentations may require sign language interpreters.

The following is the recommended accessible format for creating documents:

- ✓ Font Size - minimum of 14
- ✓ Font Style – Verdana or Arial
- ✓ Use strong colour contrasts to ensure sufficient contrast between text and background i.e. black lettering on white paper
- ✓ Use pre-set style for headings (Heading 1) which will be better recognized by software that will read the screen to users
- ✓ Use real text rather than text with graphics. If necessary, provide written description for visual content such as diagrams, images or charts
- ✓ Use spaced lines - 1.15 or 1.5
- ✓ Wherever possible, align the text on the left margin
- ✓ Use a minimum of 1" margins
- ✓ Use descriptive video to describe visual portions of video content
- ✓ Provide captioning for material that has an audible content

When creating an electronic document, avoid the following:

- ⊗ Font variations such as **bold**, *italics* and ALL CAPITAL LETTERS
- ⊗ Animated or flashing content
- ⊗ Using columns

## **2. Feedback Processes for Employees and the Public**

Feedback may be received either formally, solicited (i.e. surveys, etc.) or informally (i.e. telephone, *Accessible Customer Service Survey*, *Share Your Thoughts* comment cards, emails, website, etc.). CLSC is committed to providing employees and the public various methods for feedback.

## **3. Accessible Website**

We are committed to working towards an accessible website and website content that will comply with the World Wide Web Consortium Web Content Accessibility Guidelines initially at Level A and moving towards Level AA standards.

## **4. Employment**

CLSC will provide accommodations throughout the hiring process to applicants with disabilities. Where employee needs dictate, an Individual Accommodation Plan outlining the emergency response information/protocols for the employee will be developed as soon as practicable after they begin employment.

Note: The employee, supervisor or HR dept. can request the need for an accommodation.

CLSC will 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.

We 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

## Community Living St. Catharines

**Section:** Employment Practices

**Procedure:** Accessibility

**Page:** 4 of 8

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 assists the 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.

CLSC has 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.

Our performance management, succession planning and redeployment processes take into account the accessibility needs of all employees.

### **5. Documented Individual Accommodation Plans**

CLSC's process for the development of documented Individual Accommodation Plans includes:

- Employee is an active participant in the development of the plan which includes gathering relevant information and assessing individual needs
  - Information will be collected on the employee's functional abilities, not the nature of the employee's disability
  - Information (including medical information) will be kept in a secure and confidential location; and disclosed only to those who need it to perform the accommodation process.
- The employee and supervisor/HR dept. will work together to find the most appropriate accommodation. A medical or other expert's opinion on the accommodation may be engaged (at CLSC expense) to help determine if/how the employee's needs can be accommodated.
- Employee may request that a representative (union or other workplace representative) may participate in the process.
- Once the most appropriate accommodation(s) is identified, details will be documented in a written plan.
  - accommodation(s) 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)
  - how often the plan will be reviewed and how it will be done
- The supervisor will provide the employee an accessible format (if required), a copy of the individual accommodation plan, or written reasons for denying accommodation.
- After implementing the accommodation plan, the employee and their supervisor 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 the supervisor (HR dept.) will reassess the situation and update the plan.
- CLSC will review and update the accommodation plan when:
  - a) Employee's work location or position changes
  - b) Nature of the employee's disability changes

### **6. Return to Work Process**

CLSC's process for the development of a Return to Work Accommodation Action Plan for employees with disabilities who have been absent due to their disability and require accommodations to return to work will:

- Outline the steps we will take to facilitate the employee's return to work
- Use their individual accommodation plan –where it exists- as part of the process

*See Occupational Health and Safety Manual Section 18: Return to Work for further details.*

### **7. Training**

CLSC will provide training to all new employees, volunteers, students, Board of Directors and persons involved in developing policies for CLSC; and all others who provide goods, services or facilities on behalf of our agency.

The training provided will be appropriate to work duties. Training will be provided during orientation; and on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with a disability.

Training will cover:

- Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- How the Human Rights Code pertains to persons with disabilities
- Changes that are made to the accessibility policies
- How to interact and communicate with people with various types of disabilities taking into consideration their type of disability
- 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 equipment or devices available on CLSC premises or otherwise provided by CLSC, where the person interacts with the public that may help with the providing of goods or services to a person with a disability.
- What to do if a person with a disability is having difficulty in accessing CLSC goods or services.
- CLSC customer services policies, practices and procedures governing the provision of goods or services to person with disabilities

### **Training Records**

The Human Resources department will retain mandatory training records. Training records are available upon request.

### **8. Design of Public spaces**

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

## Community Living St. Catharines

**Section:** Employment Practices

**Procedure:** Accessibility

**Page:** 6 of 8

### 9. Transportation

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

### 10. Providing goods and services to people with disabilities

CLSC is committed to excellence in serving all people including those with disabilities and we will carry out our functions and responsibilities in the following areas;

#### Communication

We will communicate to people with disabilities in ways that take into account their disability. We will train staff who communicate with customers 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 customers. We will train staff to communicate with customers over the telephone in clear and plain language to speak clearly and slowly.

We will offer to communicate with customers by various means appropriate to the person, e.g. email, TTY, Bell Canada relay services, if telephone communication is not suitable to the 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 goods and services. We will ensure that our staff is trained and familiar with various assistive devices to provide customer service to people with disabilities e.g. wheelchairs, elevator lift, automated doors, lifts, walkers, large print format, canes, listening devices, etc.

### 11. Use of Support Persons and Service Animals

#### **a) Support Persons**

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 CLSC premises with his/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 his/her support person while on our premises.

#### **b) Definition: Support Persons**

“Support person” means, in relation to a person with a disability, another person who accompanies him/her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

#### **c) Service Animals**

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 also ensure

# Community Living St. Catharines

**Section:** Employment Practices

**Procedure:** Accessibility

**Page:** 7 of 8

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.

On rare occasions, a director may determine that a customer may require a support person, or that a service animal cannot enter an area of the CLSC premises consistent with other laws. In these instances, directors will suggest appropriate alternatives and provide assistance in the best interest of our customer needs.

## **d) Definition: Service Animals**

- “Guide dog” means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.<sup>1</sup>
- “Service animal” means a service animal for a person with a disability
- A dog or 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/her disability;
- If the person provides a letter from a health professional (including psychologist, optometrist, mental health therapist, etc.) confirming that the person requires the animal for reasons relating to the disability.

## **12. Notice of Temporary Disruption**

CLSC will provide customers 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,
- Anticipated duration of the disruption, and
- A description of alternative facilities or services, if available. (if any)

The Notice of Disruption form will be posted at the location of the disruption, all public entrances and service counters/reception areas on our premises.

## **13. Feedback Process**

The ultimate goal of this policy is to meet and surpass customer delivery expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated. CLSC is committed to establishing, implementing and maintaining a process for receiving and responding to feedback about how to provide goods or services to persons with disabilities. Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve customer service to people with disabilities.

CLSC shall provide information about the process readily available to the public. Customer feedback can be made by the following methods; suggestion box, Customer Feedback form, verbally in person or via telephone, fax, in writing or in electronic format including email. Feedback may be received by any employee/volunteer who deals with members of the public or other third parties on behalf of CLSC. Upon receipt, it will then be directed to the Chief Executive Officer who will respond within a reasonable timeframe. Where possible, complaints will be addressed immediately. Although a response to the complainant may not be necessary; depending on the

<sup>1</sup> Blind Persons’ Act R.S.O. 1990, c. B.7, s. 1 (1).

## Community Living St. Catharines

**Section:** Employment Practices

**Procedure:** Accessibility

**Page:** 8 of 8

situation the Chief Executive Officer may deem it appropriate to respond to the customer. Customer feedback/response will endeavor to be in a format that is accessible to the complainant.

### **14. Evaluation**

CLSC is committed to developing policies that respect and promote the dignity and independence of people with disabilities. An annual review on this policy will be conducted by the employer. This evaluation will measure compliance with the Ontario government regulations and reviews of the suggestive feedback from customers. No changes will be made to this policy without consideration of the impact on people with disabilities.

### **15. Questions about this policy**

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, inquiries can be referred to any member of senior management or Chief Executive Officer.

### **16. Reference Materials**

Integrated Accessibility Standards Regulation (IASR) – Ontario Regulation 191/11

Blind Persons' Rights Act - R.S.O. 1990

GAATES – Global Alliance on Accessible Technologies & Environments

AccessForward – Training for an Accessible Ontario

Hicks and Morley, FTR Quarterly Fall 2011

Compliance Manual for Small Businesses and Organizations – AODA, 2005

DVD – Service-Ability, Accessibility Directorate of Ontario, MCCSS

DVD – “Talk to Me”, Serving Customers with Disabilities, MCCSS