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POLICY

- 1 Under the Accessibility for Ontarians with Disabilities Act (AODA), Ontario Regulation 191/11, entitled, Integrated Accessibility Standards Regulation, the "Integrated Regulation" came into force July 1, 2011. The regulation establishes accessibility standards for information and communications, employment, and transportation, as applicable. Holland Christian Homes (HCH) is included in the regulation's definition of an "obligated organization" and must comply with the phased-in requirements of the regulation beginning January 1, 2014.
- 2 HCH abides by the AODA and ensures that all customers who use or request information about our services are treated with dignity and respect.
- 3 This policy does not pertain to employees or volunteers or the employment relationship. In the event that an employee or volunteer requires support or assistance on the basis of a disability, they are to refer to the Human Resources Policy "Workplace Accommodation Policy and Protocol". Staff are encouraged to immediately speak with their direct supervisor while volunteers should speak with the Volunteer Coordinator.

Purpose

- 1. To comply with the Accessibility for Ontarians with Disabilites Act, 2005, and
- 2. To ensure quality care and services to our senior residents, tenants and those with disabilities.
- 3. To prevent liability.
- 4. To comply with all applicable laws and regulations and statutes.
- 5. To follow the Mission Statement.
- 6. To ensure the Accessibility for Ontarians with Disabilities policies and procedures are publicly available.

DEFINITION

"Disability" means:

- (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,

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- (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 WSIB.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

Information about a disability is personal and private and staff and volunteers treat thi issue as confidential. It is not necessary to ask for proof of a disability.

"Accessible formats" may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.

"Accommodation" means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

"**Communication supports**" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

"**Communications**" means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

"**Dignity**" means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

"Equal opportunity" means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.

"Independence" means when a person is able to do things on their own without unnecessary help or interference from others.

"Information" includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that covey meaning.

"Integration" means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals, unless an alternate measure is necessary to enable the individual to access goods or services.

"Publicly Available" means that the documents are posted onto the Holland Christian Homes website

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and hard copies are available at the Main Reception and available upon request by any internal/external stakeholder and general public.

"Reasonable efforts" means taking approaches that meet the required needs of the individual.

The customer service standard and other laws

There are other laws related to accessibility that apply to HCH covered by the customer service standard, such as the Ontario Building Code Act, 1992 and the Ontario Human Rights Code. The customer service standard does not replace or change what HCH does under these and any other laws. Where the standard sets different rules than other laws, HCH complies with both.

Failure to Comply

It is important that all staff and volunteers understand their requirement to comply with this legislation as the government allows for enforcement of the customer service standard through inspections, compliance orders and administrative penalties.

HCH COMMITTMENT

- 1. HCH is committed to the principles of independence, dignity, integration, and equality of opportunity described in the AODA and to meeting the needs of people with disabilities, in a timely manner, through the implementation of this policy.
- 2. HCH is committed to establishing, maintaining and implementing policies as well as associated practices and procedures in the Integrated Regulation, specifically in the areas of information and communications, employment and transportation, if applicable, and to meet the accessibility needs of people with disabilities in a timely manner.
- 3. HCH is committed to excellence in serving all of our clients, including people with disabilities. When providing information to, or communicating with, a person with a disability, we will provide the information and communication in a manner that takes into account the person's disability.
- 4. HCH serve seniors with varying disabilities so we are committed to excellence in serving all customers including people with disabilities.
- 5. HCH is committed to ongoing improvements to accessibility in its premises and facilities as required by law, as well as to the services offered to customers, employees, volunteers and members of the general public.
- 6. HCH is committed to promoting values that support relationships between people with disabilities and the organization.

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- 7. HCH is committed to securing the involvement of people with disabilities in the development and review of its annual accessibility plan, if applicable—this requirement only applies to public sector.
- 8. HCH is committed to the establishment, implementation, maintenance, and documentation of a multiyear accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Integrated Regulation.
- 9. HCH is committed to the incorporation of accessibility criteria and features when procuring or acquiring goods, services or facilities, as applicable.
- 10. HCH is committed to the incorporation of accessibility criteria and features when designing, procuring or acquiring self-service kiosks, when applicable.
- 11. HCH is committed to the training of all employees, persons who deal with customers and the public on Holland Christian Homes' behalf, and persons participating in the development and approval of Holland Christian Homes policies, practices and procedures on the requirements under the Integrated Regulation and the Human Rights Code as it pertains to persons with disabilities.
- 12. HCH is committed to implementing specific requirements, policies, practices and procedures, and a multi-year plan under the Standards for Information and Communication, Employment and as applicable.

HOW HCH COMPLIES WITH THE STANDARDS

- 1. HCH has established policies, practices and procedures on providing services to people with disabilities.
- 2. Policies, practices and procedures are consistent with the core principles of independence, dignity, integration and equality of opportunity.
- 3. People accessing our services have the right to use their own personal assistive devices to access services and about any other measures we offer (assistive devices, services, or methods) to enable them to access our services.
- 4. HCH staff and volunteers are trained to communicate with a person with a disability in a manner that takes into account his or her disability.
- 5. HCH permits people with disabilities to be accompanied by their guide dog or service animal in any area of our homes and towers.
- 6. HCH permits people with disabilities who use a support person to bring that person with them while accessing any services in our home.
- 7. HCH provides notice when our facilities or services that people with disabilities rely on to access or

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use our services are temporarily disrupted. Such notices are posted throughout the building.

- 8. HCH provides annual training to all staff and any people who interact with the public.
- 9. HCH trains staff, volunteers, contractors and any other people who are involved in developing our policies, practices and procedures on the provision of goods or services. The training will be appropriate to their duties/position and provided as soon as practicable and respect to any changes to the individual. Records of training shall be maintained either electronically or hard copy and shall include date and number of individuals to whom the training was provided.
- 10. HCH has feedback form (located at reception and the website) for people to provide feedback on how we provide services to people with disabilities, how we respond to feedback and take action on any complaints. HCH makes the information about our feedback process readily available to the public.
- 11. HCH posts a copy of this policy notifying customers that our policies are available upon request on our website and at reception.
- 12. HCH documents in writing all our policies, practices and procedures for providing accessible customer service. All copy of policies are available upon request.
- 13. Where admission fees are charged, HCH provides notice ahead of time on what admission, if any, would be charged for a support person of a person with a disability.
- 14. When giving documents required under the customer service standard to a person with disability, HCH provides the information in a format that takes into account the person's disability such as a hard copy sheets, copy on USB or CD, etc.

PROCEDURES

HCH will monitor and evaluate accessibility initiatives and changes to applicable legislation and/or regulations. Changes to policies, plans and initiatives will be incorporated as required.

Feedback Process

The ultimate goal of HCH is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Anyone who would like to provide feedback on how HCH provides programs or services to people with disabilities may contact the following personnel:



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- Residents, tenants, families and visitors of residents/tenants may bring any questions or concerns directly to the Administrator, Director of Resident Care, Director of Tenant Care or to any member of the resident's care team.
- For others, concerns may be directed to the HCH staff running a particular event or supervising the area attended by the resident/tenant.
- Staff feedback regarding any services to people with disabilities can be directed to the Human Resources department by mail, email and/or verbally. Any written feedback can also be placing it into the locked drop box outside of the HR department.

Use of Service Animals and Support Persons

HCH welcomes 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. HCH staff, volunteers and others dealing with the public allow the service animal to enter and do not touch the animal without permission to the customer. Staff asks the customer about what support they need for the animal while on the premises (i.e. bowl of water, etc).

In the case of a service animal, staff does not require or request copies of the vaccination and license of the animal unless the person becomes a permanent resident at which time we would request such documentation.

HCH welcomes people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person is allowed to enter HCH 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 his or her support person while on our premises.

Fees will not be charged for support persons for admission to HCH premises unless a meal is eaten by the Support Person. If a meal is eaten, the charge to the support person is the standard visitor meal cost. Customers are informed of this.

<u>Training</u>

HCH ensures that annual training is provided to all employees, volunteers and others who deal with the public or other third parties on behalf of HCH and all those who are involved in the development and approvals of customer service policies, practices and procedures.

Training includes the following:

- The purposes of the AODA and the requirements of the customer service standard.
- Tips on how to interact and communicate with people with various types of disabilities.
- Tips on how to use assistive devices, eg wheelchair lifts, etc. available or otherwise that may help with the provision of goods or services to people with disabilities.
- Tips on how to require the assistance of a service animals or support person.



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- What to do if a person with a disability is having difficulty in accessing HCH services.
- HCH policies, practices and procedures relating to the customer service standard.
- Staff is trained throughout the Mandatory Training every year.
- Maintain written records of all training done to meet the accessibility requirements.

Modifications to this or other Policies

HCH is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes are made to this policy before considering the impact on people with disabilities. Any policy of HCH that does not respect and promote the dignity and independence of people with disabilities are modified or removed.

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, an explanation should be provided by, or referred to the Director of HR.

REFERENCES and RELATED POLICY and PROCEDURE

- ACCESS ON website
- o Accessibility Ontario Website
- o Accessibility Standards for Customer Service, Ontario Regulation 429/07
- o Ontario Human Rights Code Learning/Working together- Code and AODA
- o Multi-Year Accessibility Plan
- AODA LANGUAGE & TERMINOLOGY
- Accessibility Feedback Form