

## Policy and Procedure - ADM-7-10: Accessibility

**Effective Date:** November 18, 2024  
**Revision #:** 4

### Scope

All employees, clients, volunteers, and students

### Rationale

To ensure compliance with the Ontario Human Rights Code, the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* including *Ontario Regulation 429/07: Accessibility Standards for Customer Service* and *Ontario Regulation 191/11: Integrated Accessibility Standards* and to minimize barriers to equal access and participation.

### Policy

Community Care Peterborough (CCP) is committed to ensuring equal access and participation for people with disabilities. We are committed to excellence in treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and Ontario's accessibility laws.

CCP understands that obligations under AODA and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law. We are committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

CCP recognizes that beyond physical, environmental, transportation, and communication barriers, clients may face other barriers to receiving service based on finances, access to information, and attitudes. We approach minimizing barriers broadly by taking all of these factors into account. CCP's accessible customer service practices are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities and for people facing other barriers to service.

CCP's Chief Executive Officer is responsible for compliance with accessibility legislation, regulations, and requirements and is supported by CCP's Accessibility Advisory Committee.

### Definitions

**Accessibility:** Accessibility refers to the design of products, devices, services, or environments for people who experience disabilities. Ontario has laws to improve accessibility for people with disabilities, including the Accessibility for Ontarians with Disabilities Act (AODA), the Ontario Human Rights Code, and the Ontario Building Code.

**Barrier:** A barrier is a circumstance or obstacle that keeps people apart. For people with disabilities, barriers can take many forms including attitudinal, communication, physical, policy, programmatic, social, and transportation.

**Disability:** A disability is a physical or mental condition that limits a person's movements, senses, or activities. The AODA uses the same definition of disability as the Ontario Human Rights Code.

**IASR:** The AODA has five Standards which are included in the Integrated Accessibility Standards (IASR). These include the Customer Service Standard; Employment Standard; Information and Communication Standard; Design of Public Spaces Standard; the Transportation Standard; as well as some general requirements.

**Standard:** The Act operates by bringing accessibility standards into regulation. Accessibility standards are laws that individuals, government, businesses, nonprofits, and public sector organizations must follow in order to become more accessible. The accessibility standards contain timelines for the implementation of required measures and help organizations identify, remove, and prevent barriers in order to improve accessibility for people with disabilities.

### Procedures

#### Training

1. CCP is committed to training all employees and volunteers in accessible customer service, Ontario's accessibility standards, and aspects of the Ontario Human Rights Code that relate to persons with disabilities.
2. Training of employees and volunteers on accessibility relates to their specific roles and includes:
  - a) Purpose of the *Accessibility for Ontarians with Disabilities Act, 2015* and the requirements of the Customer Service Standards;
  - b) CCP policies related to the Customer Service Standards;
  - c) how to interact and communicate with people with various types of disabilities;
  - d) how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;

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- e) how to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities; and
  - f) what to do if a person with a disability is having difficulty in accessing our organization's goods, services, or facilities.
3. CCP trains every employee, volunteer, brokered helper and Board Member during the initial onboarding process and provides training in respect of any changes to the policies.
  4. CCP also trains other persons who provide goods, services, or facilities on behalf of the organization, such as contracted Exercise Instructors.
  5. CCP maintains records of the accessibility training provided including the dates on which the training was provided.

### Assistive Devices

6. People with disabilities may use their personal assistive devices when accessing CCP services or facilities.
7. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access CCP services or facilities.

### Communication

8. CCP will communicate with people with disabilities in ways that take into account their disability. This may include, but is not limited to, the following:
  - a) Large print;
  - b) Email instead of telephone;
  - c) Amplification, headphones, or assistive listening devices;
  - d) Message relay services;
  - e) communicating with a contact person designated by the person with a disability.
9. CCP will work with the person with disabilities to determine what method of communication works for them. A fee will not be charged to provide information and communications in an accessible format.

### Service Animals

10. CCP welcomes people with disabilities and their service animals. Service animals are allowed on the parts of CCP premises that are open to the public and third parties.
11. When it cannot be easily identified that an animal is a service animal, employees may request documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A service animal can be easily identified through visual indicators, such as when it

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wears a harness or a vest, or when it helps the person perform certain tasks.

12. If service animals are prohibited by another law, CCP will do the following to ensure people with disabilities can access CCP services or facilities:
  - a) Explain why the animal is excluded;
  - b) discuss with the individual another way of providing services or access to facilities.

### Support Persons

13. A person with a disability who is accompanied by a support person will be allowed to have that person accompany them for service delivery and on CCP premises.
14. Fees will not be charged for support persons.
15. In certain cases, CCP might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability, or others on the premises.
16. Before making a decision about requiring a mandatory support person, CCP will:
  - a) Consult with the person with a disability to understand their needs;
  - b) consider health or safety reasons for the requirement based on available evidence; and
  - c) determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

### Notice of Temporary Disruption

17. In the event of a planned or unexpected disruption to services or facilities for individuals with disabilities, CCP will provide prompt notification.
18. This clearly posted notice will include information about:
  - a) the reason for the disruption;
  - b) its anticipated duration; and
  - c) a description of alternative facilities or services, if available.
19. The notice will be made publicly available on posted notices on facilities' doors, CCP's website, and other social media platforms.

### Procuring Goods, Services, or Facilities

20. Accessibility design, criteria, and features when procuring or acquiring goods, services, or facilities, will be incorporated into the decision-making process, except where it is not practicable to do so.
21. If it is not practicable to incorporate accessibility design, criteria, and/or features when procuring or acquired goods, services, or facilities, CCP will be prepared to provide an explanation why if requested.

### Feedback Process

22. CCP welcomes feedback on how the organization provides accessible customer service. Feedback will help CCP identify barriers and respond to concerns. Feedback may be provided in the following ways:
  - a) Hardcopies of the *AODA Feedback Form* are available at all CCP locations;
  - b) an electronic AODA Feedback Form is available on our website;
  - c) a direct inquiry or feedback option is available through email: [accessibility@commcareptbo.org](mailto:accessibility@commcareptbo.org); or
  - d) calling any CCP service office.
23. All feedback, including complaints, will be directed to Management. Individuals can expect to hear back from a Supervisor or Manager within two (2) working days of receiving the written information, letter, email, or phone call. A review will be undertaken and a response provided within five (5) working days.
24. CCP ensures the feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

### Notice of Availability of Documents

25. CCP notifies the public that documents related to accessible customer service, are available upon request by posting a notice on the website: [www.commcareptbo.org](http://www.commcareptbo.org)
26. CCP will provide documents related to accessible customer service in an accessible format or with communication supports, on request. CCP will consult with the person making the request to determine the suitability of the format or communication support. The documents will be provided in the accessible format in a timely manner and at no additional cost.

### Information and Communications

27. CCP has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.
28. CCP will communicate with people with disabilities in ways that take into account their disability. When asked, CCP will provide information about the organization and its services in accessible formats or with communication supports:
  - a) In a timely manner, taking into account the person's accessibility needs due to disability; and
  - b) at a cost that is no more than the regular cost charged to other persons.
29. CCP will consult with the person making the request in determining the suitability of an accessible format or communication supports. If CCP determines that information or communications are unconvertible to an accessible format, CCP will provide the requestor with:
  - a) An explanation as to why the information or communications are

- unconvertible; and
- b) a summary of the unconvertible information or communications.

30. CCP will meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

### Employment

31. CCP will notify employees, job applicants, and the public that accommodations can be made during recruitment and hiring.
32. CCP will notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. CCP consults with the applicants and provides or arranges for suitable accommodation.
33. CCP will notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.
34. CCP will notify employees that supports are available for those with disabilities during the onboarding process. CCP provides 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.
35. CCP 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. CCP 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.
36. CCP has a Positive and Safe Return to Work Policy for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.
37. CCP's performance management, professional development, and redeployment processes take into account the accessibility needs of all employees.

### Employee Workplace Emergency Response Information

38. Where needed, CCP will also provide customized emergency information to help an employee with a disability during an emergency. CCP will provide the information as soon as practicable after it becomes aware of the need for accommodation due to the employee's disability.
39. With the employee's consent, CCP will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

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40. CCP will review the individualized workplace emergency response information:
  - a) When the employee moves to a different location in the organization;
  - b) when the employee's overall accommodations needs or plans are reviewed; and
  - c) when CCP reviews its general emergency response policies.

### **Design of Public Spaces**

41. CCP will meet accessibility laws when designing, planning, selecting, or making major modifications to public spaces.
42. CCP will ensure that space used for the provision of services and programs are accessible and where possible include:
  - a) Outdoor paths of travel, like sidewalks, paved parking lot, ramps, stairs, curb ramps
  - b) Elevators
  - c) Accessible washrooms
  - d) Accessible off-street parking
  - e) Service-related elements like counters and waiting areas
  - f) Ensure subcontracts / landlords uphold regular property maintenance, ie. during inclement weather
  - g) Ensure subcontracts / landlords uphold regular property maintenance schedules.
43. Accessibility considerations, factors, and barriers are assessed using the Facility Checklist when new service locations are being evaluated. Potential required accommodations will also be identified in anticipation of the needs of individuals accessing the space including clients, caregivers, volunteers, employees, and customers.

### **Changes to Existing Policies**

44. Any policies of CCP that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.
45. This policy ADM-7-10 Accessibility is publicly available. Accessible formats are available upon request.

### **Accessibility Assessment**

46. The Accessibility Advisory Committee will conduct a formal accessibility assessment annually that identifies, mitigates, prevents, and removes (where possible) accessibility barriers for all stakeholders.

47. The accessibility assessment will include:
- a) Seeking out and including feedback from stakeholders;
  - b) Identifying trends and other key learnings;
  - c) Identifying action steps;
  - d) Implementing an accessibility plan;
  - e) Formally evaluating the effectiveness of actions taken;
  - f) Sharing results with stakeholders.

### Compliance

48. As a non-profit organization with 20 or more employees CCP will complete an Accessibility Compliance Report for submission to the Ontario Ministry for Seniors and Accessibility every three (3) years.

### Related Policies

HS-1-120 Positive and Safe Return to Work

### Related Documents

Accessibility Compliance Report  
Accessibility for Ontarians with Disabilities Act, 2005  
CCP Multi-Year Accessibility Plan  
Facility Checklist  
Guidelines for Delivering Accessible Customer Service for Community Care  
Peterborough  
Ontario Humans Rights Code  
*Ontario Regulation 191/11: Integrated Accessibility Standards*  
Ontario Regulation 429/07: Accessibility Standards for Customer Service

### Reviews and Revisions

Apr, 20, 2016	Approved by Executive Director
Sep 4, 2019	Reviewed and revised by Executive Director
May 19, 2023	Reviewed and revised by Executive Director
Sep 26, 2023	Reviewed and revised by Accessibility Advisory Committee
Nov 18, 2024	Reviewed and revised by Accessibility Advisory Committee

### Next Review Date

November 2027