
	MANUAL: Administration	SECTION/ DEPARTMENT: Administration	Policy Number: 1-AD-02	Pages: 1 of 7	
SUBJECT: Accessibility Policy				AREA OF FOCUS: Administration <input checked="" type="checkbox"/> Resident Services <input type="checkbox"/>	
Effective: 01/01/12	Last Revised: 01/07/15	Supersedes:	Next Review: 01/07/17	Approved By: Senior Management Team	

1.0 PURPOSE:

This policy is intended to meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies a framework of how St. Joseph's Lifecare will apply the requirements to develop and/or review other policies, procedures, standards and guidelines.

a) Unless otherwise stated, this policy applies to the provision of goods and services at the premises owned by St. Joseph's Lifecare Brantford and located in the province of Ontario.

b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of St. Joseph's Lifecare Centre including when the provision of goods and services occurs off the premises of St. Joseph's Lifecare Centre such as in: delivery services, call centers, vendors, drivers, catering and third party marketing agencies.

c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned by St. Joseph's Lifecare Centre.

d) This policy shall also apply to all persons who participate in the development of the St. Joseph's Lifecare Centre's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

2.0 POLICY:

In keeping with our corporate values of RESPECT, St. Joseph's Lifecare Centre is committed to excellence in serving all customers, including people with disabilities, and will carry out its functions and responsibilities in an appropriate manner to accommodate such individuals.

As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard and the Integrated Accessibility Standards Regulation for Information and Communications and eventually Employment, Transportation and the Built Environment.

All goods and services provided by St. Joseph's Lifecare Centre shall follow the principles of dignity, independence, integration and equal opportunity.

POLICY TIMELINE REQUIREMENTS

Provision of all requirements will be made available on or before the dates as specified in the applicable regulation(s).

CROSS REFERENCE

Accessibility for Ontarians with Disabilities Act, 2005
 Accessibility Standards for Customer Service, Ontario Regulation 429/07
 Integrated Accessibility Standards, Ontario Regulation 191/11
 Blind Person's Rights Act, 1990
 Dog Owners' Liability Act, Ontario
 Health Protection and Promotion Act, Ontario Regulation 562
 Food Safety and Quality Act, 2001
 Ontario Human Rights Code, 1990
 Other Accessibility Standards as approved into regulation

GENERAL

Accessibility Committee

St. Joseph's Lifecare Centre has established a committee which will provide advice on the identification, removal and prevention of barriers, including the implementation of the Accessibility of Ontarians with Disabilities Act (AODA) and its regulations and other matters for which St. Joseph's Lifecare Centre may seek advice or consultation.

Accessibility Plan

St. Joseph's Lifecare Centre will develop, implement, maintain and make public a multi-year accessibility plan in consultation with the Accessibility Committee. The plan will be reviewed and, if necessary, updated at least once every five (5) years. The plan will outline the strategy to identify, remove and prevent barriers to meet the legislated requirements of the AODA and its regulations. The plan will be posted on the St. Joseph's Lifecare Centre's web site and made available in an accessible format or with appropriate communication supports as soon as possible upon request.

Accessibility Report

St. Joseph's Lifecare Centre will prepare and file an accessibility status report on progress and measures taken to implement the multi-year accessibility plan and steps taken to comply with the Integrated Accessibility Standards as specified in regulation.

Training

Training on the requirements of the AODA and its regulations and on the Human Rights Code as it pertains to persons with disabilities will be provided to all employees, volunteers, agents and/or contractors, who deal with the public or other third parties that act on behalf of St. Joseph's Lifecare Centre; for example: salespersons, drivers, vendors, event operators, call centers and third party marketing agents;

St. Joseph's Lifecare Centre will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and contractors who deal with the public or act on our behalf during orientation. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

St. Joseph's Lifecare Centre will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Contractors and agents providing services to the public on behalf of St. Joseph's Lifecare Centre will be

required to provide evidence their staff has received appropriate training as required by the AODA and its regulations.

ACCESSIBLE CUSTOMER SERVICE

A. Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by St. Joseph's Lifecare Centre.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another.

Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

B. Support Persons

If a customer with a disability is accompanied by a support person, St. Joseph's Lifecare Centre will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations St. Joseph's Lifecare Centre will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas:

A customer with a disability that is accompanied by a guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) St. Joseph's Lifecare Centre will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee.)

Applicable Laws:

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types

of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, St. Joseph's Lifecare Centre may request verification from the customer.

Verification may include:

- ☐ a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- ☐ a valid identification card signed by the Attorney General of Canada; or,
- ☐ a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, St. Joseph's Lifecare Centre will make all reasonable efforts to meet the needs of all individuals.

D. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of St. Joseph's Lifecare Centre. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use St. Joseph's Lifecare Centre's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will Include:

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- ☐ goods or services that are disrupted or unavailable
- ☐ reason for the disruption
- ☐ anticipated duration
- ☐ a description of alternative services or options

Notifications Options:

When disruptions occur, St. Joseph's Lifecare Centre will provide notice by:

- ☐ posting notices in conspicuous places including at the point of disruption and at the main entrance and the nearest accessible entrance to the service disruption;
- ☐ contacting customers with appointments;
- ☐ verbally notifying customers when they are making a reservation or appointment; or
- ☐ by any other method that may be reasonable under the circumstances

ACCESSIBLE INFORMATION AND COMMUNICATIONS

A. Accessible Formats and Communication Supports

Communications that St. Joseph's Lifecare Centre produces, directly or indirectly through contractual relationships, are available in accessible formats upon request unless to do so would cause undue hardship.

When an accessible format or communication support is requested, St. Joseph's Lifecare Centre will consult with the requesting person to determine which format or support is required and provide the material in a reasonable amount of time and at no additional cost.

This section does not apply to products, product labels, unconvertible information or communications.

If information or communications are determined to be unconvertible, St. Joseph's Lifecare Centre will provide the person making the request with the reason why the material is unconvertible and a summary of the unconvertible material in an accessible format.

B. Notice of Availability of Documents

Notice of the availability of documents in alternative formats and communication supports will be posted on the St. Joseph's Lifecare Centre's website and by other methods as is reasonable in the circumstance.

C. Accessible Websites and Web Content

St. Joseph's Lifecare Centre will make its website, and web content, conform to the Worldwide Web Consortium's Web Content Accessibility Guidelines 2.0 requirements on or before the compliance deadlines.

D. Emergency procedure, plans, or public safety information

If St. Joseph's Lifecare Centre prepares emergency procedures, plans or public safety information and makes that information available to the public, St. Joseph's Lifecare Centre will provide the information in an accessible format or with appropriate communication supports as soon as possible, upon request.

E. Feedback

St. Joseph's Lifecare Centre has a process in place for receiving and responding to feedback and will ensure that those processes are accessible for persons with disabilities by providing, or arranging for, the provision of accessible formats and communication supports upon request.

ACCESSIBLE EMPLOYMENT

A. Scope

The requirements in this section apply only to employees of St. Joseph's Lifecare Centre. Volunteers and other non-paid individuals are not captured under this section.

B. Workplace Emergency Response Information

Where an employee has a disability and St. Joseph's Lifecare Centre is aware of his or her need for accommodation, an individualized emergency response plan will be developed for the employee. This will be done as soon as possible after St. Joseph's Lifecare Centre becomes aware of the need for accommodation.

If the employee who receives individual workplace emergency response information requires assistance and with the employee's consent, St. Joseph's Lifecare Centre will provide the workplace emergency information to the person designated by St. Joseph's Lifecare Centre to provide assistance to the employee.

C. Return to Work Process

St. Joseph's Lifecare Centre will develop, and have in place, a return to work process for employees who have been absent due to a disability, and require workplace accommodations in order to return to work. The process will document the steps St. Joseph's Lifecare Centre will take to facilitate the return to work and include an individual accommodation plan.

ADMINISTRATION:

If you have any questions or concerns about this policy or its related procedures please contact our Support Service Manager at:

St. Joseph's Lifecare Centre
 1-519 751 7096 ext. 3423
 99 Wayne Gretzky Parkway
 Brantford ON N3S 6T6

DEFINITION or TERMS OF REFERENCE

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Accessible Formats – include but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Barrier – as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including: physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Communications – as defined in the Ontario Regulation 191/11, means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

Communication Supports – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready – an electronic or digital format that facilitates conversion into an acceptable format.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

☐ 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;

☐ a condition of mental impairment or a developmental disability;

☐ a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;

☐ a mental disorder; or,

☐ an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in *Ontario Regulation 58 under the Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Internet Website – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible

to the public.

Intranet Website – an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.

Medical Aid – As defined in Ontario Regulation 191/11, means assistive device, including respirators and portable oxygen supplies.

Mobility Aid – As defined in Ontario Regulation 191/11, means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Aid – As defined in Ontario Regulation 191/11, means cane, walker or similar aid.

Service Animal – as reflected in *Ontario Regulation 429/07*, 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 or her disability; or,
- ☑ if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562*, a dog other than a guide dog for the blind is a service dog if:

- ☑ it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or,
- ☑ the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

Web Content Accessibility Guidelines – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

Unconvertible – As defined in the Ontario Regulation 191/11, means information or communications it is not technical feasible to convert; or the technology to convert the information is not readily available.

AUDIT INDICATORS

Review of training records for all staff

AODA training is incorporated into orientation

Complaints and Feedback

This policy and its related procedures will be reviewed as required in the event of legislative changes.