

# OHC Accessibility Policy

Ottawa Home Care (“OHC”) strives at all times to provide goods, services, facilities, and employment in a way that respects the dignity and independence of persons with disabilities and is committed to removing any barriers that may prevent people with disabilities from accessing the organization and/or its services. OHC is committed to the principle of respect for dignity, independence, integration and equal opportunity for all persons. This policy and its procedures address OHC’s commitments to accessibility and the requirements of the *Accessibility for Ontarians with Disabilities Act* (“AODA”) and the AODA Standards.

## Statement of Organizational Commitment

At OHC, we are committed and fully support AODA. We will treat all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the accessibility needs of people with disabilities in a timely manner, and will do so by identifying, preventing and removing barriers to accessibility and meeting accessibility requirements under AODA and the Integrated Accessibility Standard Regulation (IASR). We will work to promote a culture of respect and acceptance for accessibility within Ontario.

## Scope

This policy applies to all OHC clients, employees, contractors, agents, volunteers, vendors, and any third-party relationships that are in contact with OHC clients and/or staff. It also applies to all OHC office premises.

## Definitions

**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 arrangement 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.

**Assistive Devices** are supporting aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).

**Communication Supports** are devices or tools to aid communication between two or more individuals and may include, but are not limited to, captioning, alternative and additional communication, plain language, sign language and other supports that help with effective communications.

**Disability** means (a) any degree of physical disability, ailment, malformation or disfigurement that is caused by bodily injury, birth defect or illness and may include but is not limited to 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 appliances 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. The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

**IASR** means Integrated Accessibility Standards Regulation

**Support Persons** are any persons, whether a paid professional, volunteer, family member, or friend, who accompany a person with a disability in order to help with communications, personal care or medical needs, or with access to goods or services.

**Service Animals** are animals individually trained to do work or perform tasks for the benefit of a person with a disability.

**Unconvertible** means it is not technically feasible to convert the information or communication or that the technology to convert the information or communication is not readily available.

**Web Content Accessibility Guidelines (WCAG)** means the world wide web consortium recommendation dated December 2008 entitled “Web Content Accessibility Guidelines”.

## **Procedures**

### **1. General Requirements**

OHC shall use every effort to ensure that it and all its representatives meet the needs of people with disabilities in a respectful and timely manner. To do so, OHC shall:

- ensure equal access and participation for people with disabilities
- ensure its information is communicated in an accessible manner
- ensure it and its representatives follow the Customer Service Standard (see Section 2 below)
- ensure it and its representatives follow the Integrated Accessibility Standard Regulations (see Section 3 below)
- ensure its office premises are barrier free
- ensure its staff and potential staff are aware that accommodations can be made, upon request
- provide training and education with respect to accessibility and aspects of the Ontario Human Rights Code that relate to persons with disabilities
- remain committed to removing and preventing any barriers to accessibility by establishing and maintaining a multi-year accessibility plan
- establish and maintain processes for receiving and responding to feedback and ensure those processes are provided in accessible formats, upon request

### **2. Customer Service Standard**

OHC is committed to excellence in serving all clients, including people with disabilities, and will carry out functions and responsibilities as follows:

#### **(a) Communication**

OHC will communicate with people with disabilities in ways that take into account their disability and will work with the person to determine what method of communication is suitable for them.

OHC Staff who communicate with clients will be trained in how to interact and communicate with people with various types of disabilities.

#### (b) Telephone Services

OHC is committed to providing fully accessible telephone service to clients. Employees who communicate with clients over the telephone will be trained to speak clearly and slowly and in plain language. Staff will be able to communicate with clients by e-mail if telephone communication is not suitable for their communication needs or is not available. When needed, office staff can dial 1-800-855-0511 (TTY relay operator) to communicate with an individual who has hearing or speech disability.

#### (c) Billing

OHC is committed to providing accessible invoices to all clients. For this reason, invoices will be provided in alternative methods upon request and staff will answer any questions clients may have about the content of the invoice by telephone or e-mail.

#### (d) Use of Support Persons and Service Animals

OHC is committed to welcoming people with disabilities who are accompanied by a support person or a service animal into the OHC office building. At no time will a person with a disability who is accompanied by a support person or service animal be prevented from having access to his or her support person or service animal while on the premises.

If a client with a service animal is seeking to attend an area of the facility that is unable to be accessed by the service animal, we will discuss with the client why that exclusion may be necessary and determine other ways to ensure the same provision of goods or services.

#### (e) Notice of Temporary Disruption

The OHC's office building have the following features for people with disabilities:

- Elevator;
- Powered door operator; and
- Wheelchair accessible bathrooms

In the event of a planned or unexpected disruption to those building's features for people with disabilities, OHC will promptly post a notice. This notice will include:

- Reason for the disruption
- Anticipated length of time of the disruption
- Description of alternative facilities or services, if available

The notice will be posted on the front entrance doorway and on the OHC office door, if applicable.

#### (f) Training for Staff

OHC will ensure training is provided to every employee, volunteers, placement students, and any other person who provides goods, services and/or facilities to clients on behalf of OHC.

The training will be provided within 2 weeks of such person obtaining a role that provides services to OHC clients and if/when any significant changes are made to this Policy. OHC will maintain accurate records of training delivered. Training will include:

1. An overview of AODA, the requirements of the Customer Service Standard, the Integrated Accessibility Standard and any other applicable legislation
2. AODA Multi-year Plan
3. How to interact and communicate with people with various types of disabilities
4. Overview of accessible features at OHC's office (for example, elevators, powered door at the front entrance and accessible washrooms)
5. <https://crtc.gc.ca/eng/phone/acces/mrsrt.htm> TTY Relay Services (1-800-855-0511)

#### (g) Feedback Process

The goal of this policy is to meet expectations while serving those with disabilities. Comments on how well those expectations are being met are welcome and appreciated. Individuals who wish to provide feedback on the way OHC provides services to people with disabilities can do so in a variety of ways:

- by e-mail: [ohc@ottawahomecare.ca](mailto:ohc@ottawahomecare.ca)
- by fax: 613-249-0344
- by phone: 613-746-7879/ TTY toll-free number 1-800-855-0511
- in person: Suite 300 – 2 Lorry Greenberg Drive, Ottawa, Ontario
- on our website: <https://www.ottawahomecare.ca/>

If none of these are suitable methods to provide feedback or receive responses, individuals may request another method, at which time, OHC will consult with the individual to determine other methods taking into account the suitability of an accessible format or communication support.

Please refer to the AODA Feedback Process for details on how OHC responds to feedback received.

### **3. Integrated Accessibility Standards Regulation (IASR)**

#### (a) Procuring, Obtaining or Acquiring Goods, Services or Facilities

OHC will review accessibility criteria and features, where appropriate, when procuring, obtaining or acquiring goods, services or facilities as part of its commitment to accessibility.

#### (b) Information and Communications

OHC will create, provide and deliver information and communications in ways that are accessible to people with disabilities.

##### (b.1) Accessible Formats and Communication Supports

Upon request, OHC shall provide or arrange for accessible formats and communication support to be made available, in a timely manner, for persons with disabilities. OHC shall consult with the person making the request to determine the suitability of an accessible format or

communication support to be used. OHC shall do so at a cost that is no more than the regular cost charged to other persons, when applicable.

If OHC determines that it is not technically feasible to convert the information or communications to the requested format or the technology to convert the information or communications is not readily available, OHC will provide the person making the request with an explanation as to why the information or communications are unconvertible along with a summary of the unconvertible information or communications.

#### (b.2) Emergency Information

OHC's emergency procedures and plans shall provide the information in an accessible format or, upon request, with appropriate communication supports, as soon as practicable.

#### (b.3) Website Accessibility

OHC shall make their internet website and web content conform with the WCAG 2.0, initially at Level A and increasing to Level AA, by December 31<sup>st</sup>, 2029.

#### (c) Employment Standard

The Employment Standard under AODA builds upon the requirements of the Human Rights Code (Ontario) in relation to how OHC will provide accessibility throughout the employment cycle. It applies in respect to employees and does not apply to volunteers and other non-paid individuals, however, OHC will make equal effort to accommodate volunteers and other non-paid individuals.

##### (c.1) Recruitment and Hiring

OHC shall notify employees and the public about the availability of accommodations for applicants with disabilities, during the recruitment process, when job applicants are individually selected to participate in an assessment or selection process. If a selected applicant requests accommodation, OHC shall consult with the applicant and provide or arrange for the provision of suitable accommodation that takes into account the applicant's disability.

##### (c.2) Employee Notification

OHC shall inform its employees of the policies available to support those with disabilities, including but not limited to, policies on the provision of job accommodation. Notification will be provided to new employees as soon as feasible after they begin their employment and to all employees whenever there is a change to existing policies on the provision of job accommodation due to a disability.

#### (c.3) Accessible Formats and Communication Supports for Employees

Upon request by a OHC employee with a disability, OHC will consult with the employee to provide or arrange for the provision of accessible formats and communication supports with respect to:

- Information that is needed to perform the employee's job
- Information that is generally available to employees in the workplace
- The employee's supervisor or HR will consult with the employee making the request in determining the suitability of an accessible format or communication support.

#### (c.4) Individual Accommodation Plan (IAP)

Upon request, OHC shall develop a documented IAP for employees with a disability. The IAP shall be developed with the employee's participation and, if requested, participation of a representative from the workplace chosen by the employee. The IAP shall be developed using the following protocols:

- Assessment on an individual basis
- Identification of accommodations to be provided
- Timelines for the provision of accommodations
- If deemed necessary, an evaluation by outside medical or other expert, at OHC's expense, to assist with determining accommodation and how to achieve accommodation
- Identification of steps to be taken to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed and/or updated and the manner in which the review will be done;

- If accommodation is denied, the reasons for denial are to be provided to the employee as part of the IAP process;
- Identification of any other accommodation that is to be provided.
- The format for the IAP must take into account the employee's disability needs and any communication supports required and be produced in an accessible format.

#### (c.5) Return to Work

OHC has a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented for each returning employee and include an IAP, where appropriate.

#### (c.6) Performance Management

OHC will take into account the accommodation needs and/or IAPs of its employees when:

- Using performance management processes;
- Providing career development and advancement information;
- Using reassignment and redeployment procedures.

#### (c.7) Workplace Emergency Response Information

Upon request, and as soon as feasible after becoming aware of the request, OHC will provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary. If the employee who receives an individualized workplace emergency response information requires assistance, and with that employee's consent, OHC shall provide the workplace emergency information to a person designated by OHC to provide assistance to the employee in the event of a workplace emergency.

OHC shall review the individualized workplace emergency response information when the employee moves to a different location within the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.