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| Title | Accessibility | Number | ADPP 4.1.12 |
| Approved by | Jennifer Rodgers | Last Approved | December 2023 |
| | Director Corporate Clinical Support | Next Review | December 2025 |

Questions about this policy

This policy states our commitment to ensuring accessibility for persons with disabilities in the areas of information, communication, services, and recruitment. If anyone has a question about this policy or would like to obtain this document in an alternate format, please contact us at hrctg@closingthegap.ca or (905) 306-0202 extension 2036.

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| Preamble | Human rights are entrenched in law across Canada: The <i>Canadian Human Rights Act</i> and the <i>Canadian Charter of Rights and Freedoms</i> ensure equality of opportunity and freedom from discrimination across Canada. Ensuring the rights of persons with disabilities is gaining momentum across the country: In Ontario, legislation enforces accessibility standards (<i>AODA 2005</i>); while in Nova Scotia, work is underway to shape accessibility legislation that will make the province a more accessible and inclusive place to live. This policy explains how Closing the Gap Healthcare fulfils its commitment to provide a barrier-free environment for our clients, workers, and all other persons who enter our premises, or access our information or services. |
| Policy | <p>Closing the Gap Healthcare (CTG)</p> <ol style="list-style-type: none"> 1. Complies with both federal and provincial legislation with respect to human rights and accessibility for disabled persons. 2. Provides information and services to all persons in a way that respects their dignity, independence, integration and equal opportunity. 3. Ensures our facilities, materials and services are accessible to all persons with a disability. 4. Solicits and receives feedback from clients, workers, and other stakeholders about accessibility issues and uses this information to inform individualized accessibility or accommodation plans, and continuous improvement of its materials and facilities. |
| Standards | <p>A. Information and Communication Standards</p> <ol style="list-style-type: none"> 1. <u>Feedback</u> CTG welcomes feedback and requests for a copy of any material regarding accessible formats, communication supports or recruitment through the “Feedback” button on the Accessibility page of our website www.closingthegap.ca. 2. <u>Accessible Formats and Communication Support</u> Upon request, CTG provides, or arranges for the provision of, accessible formats and communication supports for persons with disabilities, taking into account the person’s accessibility needs. 3. <u>Accessible Website and Web Content</u>: CTG’s website <ol style="list-style-type: none"> a. Conforms to Web Content Accessibility Guideline 2.0 Level AA accessibility, and b. Provides telephone and fax contact information for local offices and Human Resources. <p>B. Customer Service Standards</p> <ol style="list-style-type: none"> 1. <u>Commitment to Service Excellence</u> CTG provides service in a professional, polite and helpful manner; all interactions are conducted with integrity, discretion and respect. Refer to Policy: <i>Code of Conduct</i>. 2. <u>Service Animals</u> CTG welcomes persons with disabilities and their service animals at our service sites and welcomes the person to keep the service animal with them. 3. <u>Support Person</u> CTG welcomes support persons for disabled persons at our service sites and collaborates with the disabled person to understand their needs for the support person to be present during a client visit, daily, or in the workplace. |

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C. Employment Standards

1. Recruitment, Assessment or Selection Process

- a. CTG notifies job applicants that accommodations are available upon request in all job postings as well as verbally through the assessment and selection process.
- b. If selected applicant requests an accommodation, CTG consults with the applicant and provides, or arranges for the provision of, a suitable accommodation in a manner that considers the applicant’s accessibility needs due to disability.

2. Informing Workers of Support

CTG informs all workers and volunteers of its current policies and policy updates to support employees with disabilities, including policies on the provision of job accommodations that consider an employee’s accessibility needs due to disability. This information is provided to new employees as soon as it is practicable after commencing employment.

3. Documented Individual Accommodation Plans

Upon request and with medical documentation submitted to the manager/supervisor, CTG will consult with the employee to provide, or arrange individual accommodation plans suitable to the individual’s disability.

4. Workplace Emergency Response Information

- a. CTG will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if CTG is aware of the need for accommodation due to the employee’s disability. CTG will provide this information as soon as practicable after becoming aware of the need for accommodation.
- b. Where the employee requires assistance, CTG will, with the consent of the employee provide the workplace emergency response information to the person designated by CTG to aid the employee.
- c. CTG will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee’s overall accommodation needs, or plans are reviewed.

5. Return to Work Process

- a. CTG maintains a documented return to work (RTW) process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.
- b. The RTW process outlines the steps CTG will take to facilitate the RTW and will include documented individual accommodation plans as part of the process.
- c. This RTW process will not replace or override any other RTW process created by or under any other statute.

6. Performance Management, Career Development, Advancement and Redeployment

CTG considers the accessibility needs of staff with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development, advancement to staff, or when redeploying staff.

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| | <p>D. Facility Standards</p> <p>1. <u>Office and Clinic Space</u> As a precondition to signing a rental or lease agreement or redesigning a public space such as an office / clinic space, CTG will exercise due diligence to ensure public spaces are accessible to all persons with a disability. CTG verifies that the prospective landlord</p> <ol style="list-style-type: none"> a. Has procedures for preventative and emergency maintenance of accessible elements in public spaces (e.g. elevator, power-operated doors, ramp, washroom facilities) that may be utilized by CTG staff and clients from time to time; and b. Has a process to notify tenants and the public when there are disruptions in such accessible elements e.g. elevator is out-of-service or closed for routine maintenance; a ramp repair is in progress; the designed accessible washroom is closed for plumbing repairs. <p>2. <u>Managing Temporary Disruptions to Accessible Elements</u> CTG will manage each arising situation where accessible elements are not in working order in a manner appropriate to the risk and / or business disruption it poses. At a minimum, CTG will</p> <ol style="list-style-type: none"> a. Seek information from the landlord to ascertain the reason for temporary disruption and expected timeline to restore accessible elements. b. Notify staff and clients affected by the disruption. c. Implement a contingency plan appropriate to the situation and / or individual need. |
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| Procedures | Responsibility | Action |
| | Worker | <ol style="list-style-type: none"> 1. Attends orientation and receives mandatory accessibility training; completes and submits <i>Accessibility Training Quiz</i> to manager/supervisor. 2. <u>Related to client services duties</u> <ol style="list-style-type: none"> a. Provides service to all who enter CTG premises or receive CTG services - including those with disabilities - in a manner that is congruent with CTG's Mission and Values in compliance with Policies: <i>Accessibility</i> and <i>Code of Conduct</i>; b. Recognizes and responds to client and family accessibility needs related to information, materials, and service; and c. Escalates unresolved accessibility needs to manager / supervisor to address and resolve. 3. <u>Related to personal health and safety needs</u> <ol style="list-style-type: none"> a. Completes and submits Form: <i>Disclosure of Accommodation Needs</i> to manager / supervisor; and, where required, b. Provides medical documentation to inform CTG in the development of an accommodation plan to meet their disability need. 4. <u>Related to Service Animal accompanying a disabled person</u> <ol style="list-style-type: none"> a. Welcomes the service animal to the premises. b. Ensures service animal stays with the person with a disability and remains under that person's control. c. Does not touch the service animal without permission. d. Notifies manager / supervisor <ul style="list-style-type: none"> • When the presence of the service animal poses potential risk to the health and safety of another person (e.g. severe allergies); and • When there is any question regarding whether an animal is fulfilling the role of a service animal. |

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| | | <ol style="list-style-type: none"> 5. <u>Related to a Support Person accompanying a disabled person</u> <ol style="list-style-type: none"> a. Consults with the person with a disability to understand their needs. b. Considers health or safety reasons based on available evidence. c. Acts appropriate to the accessibility need; and / or d. Consults with the manager / supervisor to determine the appropriate course of action. |
| | Management Team | <ol style="list-style-type: none"> 1. Ensures new workers receive orientation including mandatory accessibility training. 2. Receives <i>Accessibility Training Quiz</i> from new worker, scores it (passing grade 80%), follows up with workers who don't pass; and records in the HR data base when training has been completed. 3. Signs Form: <i>Statement of Commitment to Accessibility</i>; ensures it is posted in a high-traffic area at office and /or clinic sites for which they are responsible. 4. Upon receiving report of client / family unresolved accessibility issue, or worker accommodation needs during any stage of the hiring or employment status, <ol style="list-style-type: none"> a. Seeks guidance and support from Human Resources; and b. Acts appropriate to the situation to achieve a mutually agreeable resolution and / or accommodation. 5. <u>Related to Service Animals</u> <ol style="list-style-type: none"> a. Where a service animal is excluded by law, seeks to employ other measures that will enable the person with a disability to obtain, use and benefit from CTG goods and services. b. When the presence of the service animal poses a risk to the health and safety of another person (e.g. severe allergies), explores options to minimize the risk while still providing access to service. c. When there is any question regarding whether or not an animal is fulfilling the role of a service animal, asks the person with the disability to supply written confirmation from a regulated health professional, <u>not</u> limited to a physician; this document will verify the person needs the service animal for reasons relating to their disability. 6. <u>Related to Temporary Disruption to Office / Clinic Accessible Elements</u> <ol style="list-style-type: none"> a. Investigates each situation as per Policy: <i>Risk Management</i>; and b. Takes actions / develops and implements a contingency plan appropriate to the need, for example <ol style="list-style-type: none"> i. Elevator to Second Floor Office / Clinic is out of order: <ul style="list-style-type: none"> – Ensures affected clients are notified; offers an alternate accessible clinic location (where possible) or offers to reschedule visits. – Authorizes affected office staff (with accommodation in place) to work from home or from nearby accessible CTG office. ii. Automatic Door malfunction: <ul style="list-style-type: none"> – Arranges for clinic staff to meet affected client(s) to provide manual assistance. iii. Accessible washroom closed due to plumbing issue: <ul style="list-style-type: none"> – Where possible, arranges for suitable alternate washroom to be available. |

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| | Employer | <ol style="list-style-type: none"> Keeps up to date with federal and provincial accessibility legislation. Develops and oversees implementation of the CTG <i>Accessibility Plan</i> to ensure CTG achieves compliance to all accessibility standards by the legislated date. Allocates sufficient and appropriate resources to ensure CTG compliance with accessibility legislation including Standards set out in this policy. Delegates to qualified staff the review and revision of CTG accessibility policies and materials as applicable. Ensures that management and workers receive training appropriate to their roles and responsibilities related to changes in CTG policy. |
| Specific Accountabilities | Responsibility | Action |
| | Corporate Support Teams (Education, HR, Legal, Quality, IT) | <ol style="list-style-type: none"> Reviews and revises accessibility policies and materials, including training modules, as directed by the Employer; and Ensures updated versions are available to staff on CTG’s internal website, and to the public on CTG’s external-facing website www.closingthegap.ca. |
| | Human Resources | <ol style="list-style-type: none"> Receives and responds to requests for this policy in an alternate format; and all inquiries or concerns related to accessibility issues in a timely fashion taking into account the person’s accessibility needs; and Provides support to management as required related to accessibility needs for clients, workers, and other stakeholders. |
| Definitions | <p>Accessible Format refers to formats that are alternative to standard formats and are accessible to people with disabilities. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats used by persons with disabilities.</p> <p>Communication Supports: Refers to supports that individuals with disabilities may need to access information. These include but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.</p> <p>Disability refers to visible, non-visible, and fluctuating disabling conditions as follows:</p> <ul style="list-style-type: none"> Any degree of physical infirmity, malformation or disfigurement that is caused by a bodily injury, birth defect or illness and, without limiting the generality of the foregoing, including diabetes mellitus, epilepsy, brain injury, any degree of paralysis, deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog, or other animal or a wheelchair or other remedial appliance or device A condition or mental impairment or developmental disability A learning disability, a dysfunctional in one or more of the processes involved in understanding or using symbols or spoken language A mental disorder An injury or disability for which benefits were claimed or received under the provincial insurance plan (WSIB in Ontario; WCB in Nova Scotia) <p>Personal Assistive Device: For the purpose of this policy, this refers to personal supports used by person with disabilities that enable them to carry out the activities of daily living and allow access to CTG services. Client –owned equipment such as power-mobility devices are regarded as Personal Assistive Devices.</p> | |

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| | <p>Service Animal refers to an animal providing service to a person with a disability by virtue of</p> <ul style="list-style-type: none"> It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or A letter from a healthcare practitioner confirming the person requires the animal for reasons relating to a disability. <p>Support Person: In relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs; or to assist with access to goods and services.</p> <p>Web Content Accessibility Guidelines: Refers to the World Wide Web Consortium Recommendation (December 2008) entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”</p> <p>Workers refer to all members of the CTG workforce who perform work or supply services for monetary compensation regardless of employment category or work group i.e. workers and independently contracted workers, management, front-line healthcare providers and other support staff, <u>and</u> unpaid students, learners and trainees participating in work programs at CTG as approved by their school boards or post-secondary institutions.</p> | | |
| Related Documents | <p>Forms</p> <ul style="list-style-type: none"> Accessibility Training Quiz Disclosure of Accommodation Needs <p>Reference Documents</p> <ul style="list-style-type: none"> Accessibility Statement of Commitment CTG Mission and Values CTG Multi-Year Accessibility Plan | <p>Policies</p> <ul style="list-style-type: none"> Code of Conduct Contingency Planning for Client Safety Return to Work Risk and Complaint Management Workplace Diversity and Anti-Discrimination | |
| References | <ul style="list-style-type: none"> Accessibility for Ontarians with Disabilities Act (AODA), 2005 Accessible Customer Service Standards (AODA Regulation 429/7) Canadian Human Rights Act Canadian Charter of Rights and Freedoms Integrated Accessibility Standards Information and Communications (AODA Regulation 191/11) Ontario Human Rights Code Ontario Human Rights Commission | | |
| Original Approval | Approved by: | | Date: |
| | Connie Clerici, CEO | | 2 December 2013 |
| History of Policy Reviews | Approved by: | | Date: |
| | Lindsay Webb, Director HR | | 30 June 2016 |
| | Lindsay Webb, Director HR | | 16 November 2017 |
| | Cindy Sudac-Carino, Director HR | | 5 May 2020 |
| | Jennifer Rodgers, Director Corporate Clinical Support | | 27 December 2023 |