



# Niagara Falls Community Health Centre

<b>Subject:</b> Accessibility (AODA) Policy	
<b>Folder:</b> Governance and Operations	
<b>Date Approved:</b> July 2023	<b>Revision:</b>
<b>Approved By:</b> Executive Director	

**PURPOSE:**

To ensure all NFCHC employees, volunteers, students and third-party individuals

**SCOPE:**

This policy applies to all NFCHC employees, volunteers, students and third-party individuals

**POLICY:**

**STATEMENT OF COMMITMENT**

Niagara Falls Community Health Centre (NFCHC) is committed to excellence in serving all clients including people with disabilities.

The NFCHC is committed to treating 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 needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario's Accessibility Laws.

Niagara Falls Community Health Centre (NFCHC) is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Niagara Falls Community Health Centre (NFCHC) understands the obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (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. Niagara Falls Community Health Centre (NFCHC) is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

## **CLIENT SERVICE**

The NFCHC is committed to excellence in serving all clients, including people with disabilities, and will carry out its functions and responsibilities in an appropriate manner to accommodate such individuals. The NFCHC will strive to ensure that its policies, practices and procedures are consistent with the core principles of dignity, independence, integration and equal opportunity as outlined in the AODA and that people with disabilities have the same opportunity to access our services.

## **COMMUNICATION**

We consider a person's disability when communicating with them. This may include the following: utilizing a tablet with a larger font size (accessible format), writing down information instead of verbalizing, speaking with the person instead of giving them literature (communication support), braille has been incorporated into the elevator buttons, the top and bottom of the ramps and stairs have rumble strips incorporated as a non visual aid, utilizing a support person for the individual, language level is appropriate to the person(s) that are being communicated to. Translation and signing services are also incorporated into our care model as required.

## **ASSISTIVE DEVICES**

We allow the use of personal assistive devices, in areas that are open to the public, when accessing our goods, services or facilities.

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 goods, services or facilities. An example of another measure that may be used would be in the event that an electric mobility scooter is used a wheelchair may be substituted for accessibility to different areas of the facility.

We ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services and facilities.

We will provide appropriate notification of a disruption in service and a description of alternative facilities or services, if appropriate.

## **NOTICE OF TEMPORARY DISRUPTION**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the NFCHC will notify clients promptly. This clearly posted notice will include information about the reason for the disruption, the anticipated length of time, and a description of alternative facilities or services, if available.

### **SERVICES AND FACILITIES INCLUDE:**

- On call phone number for rostered clients to call if the NFCHC is closed. This number is available on the NFCHC voicemail.
- Clients will be directed to seek care at a walk-in clinic
- Clients will be directed to go directly to the nearest emergency room if they are experiencing an emergency

The notice will be made publicly available in the following ways:

- Voicemail messages will be changed to reflect the disruption
- Signs will be placed on entrances to the facility
- In the event of an NFCHC closure the notice of closures are posted on the NFCHC website, social media and on the voicemail

## **DESIGN OF PUBLIC SPACES**

We will meet accessibility laws when making changes to public spaces. Our public spaces consist of: waiting areas, meeting rooms, examination rooms, dental operatories, elevators, wheelchair ramp, hallways, accessible washrooms, entrances, and accessible off-street parking.

## **INFORMATION AND COMMUNICATION**

The NFCHC is committed to making information and communications accessible to persons with disabilities. The NFCHC will ensure that its information and communication systems and platforms are accessible and are provided in formats that meet the needs of persons with disabilities. We will consult with people with disabilities to determine their information and communications needs, when applicable.

## **ACCESSIBILITY DOCUMENTS**

The NFCHC will take the following steps to make sure that all publicly available documents are offered in an accessible format, upon request

- Provide requested information and communication supports in an accessible format.
- Determine the suitability of the accessible format or communication support through consultation with the person making the request.
- Publicly notify availability of accessible formats and communication supports.
- Provide intake forms in an accessible format, when requested.

If the NFCHC deems that information or communications are unconvertible, the NFCHC shall provide the requestor with:

- a) An explanation as to why the information/communications are unconvertible; and
- b) A summary of the inconvertible information or communications

## **ACCESSIBLE WEBSITE AND WEB CONTENT**

The NFCHC will take the following steps to make any new websites and content on those sites conform to Web Content Accessibility Guidelines (WCAG) 2.0, Level A.

- Any new websites or web content after January 1, 2014 will meet to the WWW Consortium WCAG 2.0, level A and all internet websites and web content must conform to WCAG 2.0 Level AA by January 1, 2021, in accordance with the schedule set out in the AODA Integrated Accessibility Standards Regulation.
- The NFCHC will consider AODA compliance when selecting technology vendors for new website development initiatives

## **FEEDBACK PROCESS**

The Niagara Falls Community Health Centre (NFCHC) welcomes feedback on how we provide accessible customer service. Customer feedback will help us to identify barriers and respond to concerns. Clients who wish to provide feedback on the way NFCHC provides programs and services to people with disabilities can do so during our annual survey process or are welcome at any time through the following means:

- In Person: 4790 Victoria Avenue, Niagara Falls ON
- Telephone: (905) 356-4222
- E-Mail [info@nfchc.ca](mailto:info@nfchc.ca)

## **How to file a concern:**

1. Clients are advised to discuss their concerns with the appropriate member(s) of their health care team. These professionals involved in their care may be able to resolve the issue or they may refer the individual to another more appropriate member of the team.

2. If talking to the appropriate team member does not satisfy the concern, the person may choose to put their concern in writing by completing our Client Concern Form. This form is available on the website [www.nfchc.ca](http://www.nfchc.ca) or at reception. Please note, anonymous complaints will be disregarded

## **Client Concern Forms can be:**

- **Submitted in person to NFCHC reception**
- **Emailed to: [info@nfchc.ca](mailto:info@nfchc.ca)**

3. All medical information is confidential. If the concern investigation requires a review of medical information, then written consent from the individual will be asked for.

## **SERVICE ANIMALS**

We welcome people with disabilities and their service animals in our workplace. Service animals are allowed in parts of the premises that are open to the public.

When an animal cannot be easily identified as a service animal, our staff may ask for 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 wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure that people with disabilities can access our goods, services or facilities:

- Explain why the animal is excluded
- Discuss with the customer another way of providing goods, services or facilities

Service animals are prohibited from the areas of the Niagara Falls Community Health Centre that are not open for public access.

## **SUPPORT PERSONS**

A person with a disability will be allowed to have a support person accompany them on our premises.

In certain cases, the NFCHC might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- The person with the disability
- Others on the premises

Before making a decision the NFCHC will:

- Consult with the person with the disability to understand their needs
- Consider the health and safety reasons based on the available evidence
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

## **EMPLOYMENT**

The NFCHC is committed to fair and accessible employment practices and processes that will attract and retain employees with disabilities through all the phases of employment cycle (including for example job postings, phone interviews, in person interviews, reference checks and offer letters as well as orientation).

The NFCHC will take the necessary steps to prevent and remove other accessibility barriers identified around all employment practices, including recruitment, assessment and hiring processes.

Both internal and external job postings will provide accommodation when requested and state the following:

*At NFCHC, we are committed to fostering an inclusive, accessible work environment, where all employees feel valued, respected and supported. NFCHC offers accommodation for applicants with disabilities as part of its recruitment process. If you are contacted to arrange for an interview, please advise us if you require an accommodation.*

## **RECRUITMENT AND ASSESSMENT**

“The NFCHC is committed to fair and accessible employment practices. We will take the following steps to notify the public and staff that, when requested, the NFCHC will accommodate people with disabilities during the recruitment and assessment processes and when people are hired. The recruitment policy will be reviewed and updated as necessary.”

Refer to Recruitment and Assessment Policy in NFCHC Policies- Human Resources

## **INDIVIDUAL ACCOMMODATION PLANS AND WORKPLACE ACCOMMODATION**

NFCHC will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.

- Return-to-work, Disability Management and related forms will be updated to reflect any AODA requirements.
- Annual review of the process will be done and, if changes are required, the process will be updated and re-circulated to staff.

Refer to Return to Work Program Policy in NFCHC Policies- Human Resources and Workplace Individualized Emergency Response Policy in NFCHC Policies- Human Resources.

## **PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT, AND REDEPLOYMENT**

NFCHC will consider the needs of employees with disabilities and individual accommodation plans when implementing and using performance management, career development and redeployment processes.

NFCHC will take the following steps to ensure the accessibility needs of staff with disabilities are considered when the organization is:

- Using performance management process in respect of employees with disabilities
- Providing career development and advancement to its employees with disabilities
- Redeploying employees with disabilities.
- Review, assess and modify existing related policies, procedures, and practices to ensure compliance with the IASR.

## TRAINING

We are committed to training all staff and volunteers in accessible customer service, other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) All persons who participate in developing the organization's policies; and
- b) All other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- Review of NFCHC policies related to the Customer Service Standards
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require assistance of a service animal or a support person
- 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. These include: wheelchairs, tablets
- What to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

Training of every person will occur during onboarding and training will be provided in respect to any changes to the policies.

Records will be maintained for training that is provided, including the dates that the training was provided and the number of individuals to whom it was provided.

The NFCHC is adopting the AODA and IASR trainings to the one recommended by the ministry. We will provide the training links to existing employees and initiate a mandatory refresher for all staff employed at NFCHC currently, as well as any volunteers who are present during our programming.

These links will include:

- Ontario Human Rights Commission 5 part e-learning series, *Working Together: The Code and the AODA*
- Training modules on [accessforward.ca](https://accessforward.ca) including:
  - Customer Service (45 minutes)
  - General Requirements (12 minutes)
  - Information and Communications Standards (17 minutes)
  - Employment Standards (12 minutes)



## **CHANGES TO EXISTING POLICIES**

Any policies of the NFCHC that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

## **ACCESSIBILITY COMPLIANCE REPORT**

The accessibility compliance reports are publicly available on our website, [www.nfchc.ca](http://www.nfchc.ca).