



Rideau Community
Health Services

**Rideau Community Health Services
Multi-Year Accessibility Plan
2017-2022**

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1.0 MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Rideau Community Health Services (RCHS) is committed to providing a respectful, accessible and inclusive environment for all clients, staff, volunteers and visitors.

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 by meeting our accessibility requirements under Ontario's accessibility laws.

RCHS welcomes and encourages people living with disabilities to use our services. RCHS will provide access to our services for people with disabilities in a way that respects their right to dignity, independence and integration.

We will evolve our policies and procedures to ensure compliance with the *Accessibility for Ontarians with Disabilities Act, 2005, (AODA)* and its standards for customer service, employment, transportation, environment, and information and communication.

Guided by the core principles of the *Act*, including independence, integration and equal opportunity, our goal is to progressively work to eliminate barriers to the services and employment opportunities provided by RCHS

2.0 DEFINITIONS

Accessibility:

The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.

Disability:

The AODA 2005 adopts the broad definition for disability that is set out in the *Ontario Human Rights Code*. "Disability" is:

- a) 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 a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability
- c) a learning disability, or dysfunction in one 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, 1997*.

Barrier

A "barrier" is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Integrated Accessibility Standards (IASR):

In July 2016 the AODA Customer Service Standard was amalgamated with the Integrated Accessibility Standard. The Centre's policies regarding information, communication, employment and customer service form a key part of the Centre's commitment to meeting the accessibility needs of persons with disabilities. For the Centre's full policy regarding AODA's Integrated Accessibility Standard please follow the link.

[GEN 216 – Accessibility](#)

3.0 INTRODUCTION

Rideau Community Health Services is a multi-site community organization with four sites across Lanark, Leeds and Grenville. RCHS is an accredited organization with a catchment area of approximately 60,000 residents within the tri-county region of Lanark, Leeds and Grenville. RCHS provides a comprehensive scope of primary care programs and services.

RCHS operates two Community Health Centres (CHC) – Smiths Falls and Merrickville locations. We have two (2) satellite sites which offer Telemedicine, Diabetes Education and High Risk Chiroprody- both of these sites were designed to meet *Ontarians with Disabilities Act, 2005* (AODA)

This plan is applicable to:

- All people who access our services.
- All staff, volunteers, students, contractors, consultants and others working on behalf of the Centre and who provide client services.
- Staff, Board Directors, volunteers and others who are involved in developing policies and procedures regarding the standard.
- People who accompany clients with disabilities who use our services.

The purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) is to improve opportunities for people with disabilities and to provide for their involvement in the identification, the removal and prevention of barriers. In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* (Customer Service Standard) and *Integrated Accessibility Standards, Ontario Regulation 191/11* under the AODA Rideau Community Health Services has updated their this Multi-year Accessibility Plan 2017-2022. To summarize, the report describes:

1. The measures that RCHS will take during this period,
2. The measures that RCHS has employed in the past (refer to page 9),
3. How RCHS will make this accessibility plan available to the public.

The RCHS is committed to the continual improvement of access to facilities, policies, programs, practices and services for clients and their family members, staff, volunteers and members of the community with disabilities; the participation of people with disabilities in the development and review of its annual accessibility plans; and the provision of quality programs and services

4.0 COMMITMENT TO ACCESSIBILITY PLANNING

RCCHS is committed to:

1. The continual improvement of access to facilities, policies, programs, practices and services for clients and their families, staff, volunteers and members of the community;
2. The participation of people with disabilities in the development and review of its annual accessibility plans;
3. Working toward ensuring by-laws and policies are consistent with the principles of accessibility; and
4. The training of those required regarding the requirements of the Act
5. Establishing policies, procedures and practices that describe how we serve people with disabilities.
6. Using reasonable effort to ensure our client policies are consistent with the principles of dignity, independence, integration of services and equality of opportunity.
7. Dealing with the use of assistive devices for people with disabilities in our policies.
8. Communicating with people with disabilities in ways that take into account their disabilities.
9. Welcoming people accompanied by guide dogs, service animals or support people and providing information about access.
10. Providing clear, complete, timely and prominent notice of temporary disruption of any of our services used by people with disabilities.
11. Ensuring that our board and senior management who approve policies receive training on AODA legislation.
12. Providing timely and ongoing training to our staff, students and volunteers who deal with clients to ensure their understanding of and ability to implement our policies regarding service to people with disabilities.
13. Implementing and communicating our processes for receiving and responding to feedback and handling complaints about how we provide services to people with disabilities.
14. Complying with documentation standards including availability and format of documents.

Establishment of an Accessibility Working Group

An Accessibility Working Group including clients of Rideau Community Health Services has been working with our staff to identify barriers to accessibility. The valuable input of our clients and families is used to improve programs and services and access to Rideau Community Health Services.

1. Review legislation requirements
2. Report on measures taken to identify, remove and prevent barriers to persons with disabilities;

3. Develop the list of measures the organization intends to implement in order to identify, remove and prevent barriers; and
4. Develop mechanisms for addressing any other areas the regulations may recommend.

4.1 SECTION ONE: Past Achievements to Remove and Prevent Barriers

Commitment

Rideau Community Health Services remains committed to providing a barrier free workplace and has remained in compliance since its written report of 2017.

What are barriers?

A barrier is anything that keeps someone from fully participating in all aspects of society because of a disability. Barriers can be both visible and invisible. Furthermore, while barriers are often unintentional, they can restrict access to goods and services.

Identification of barriers to accessibility

The Occupational Health and Safety Committee, Management team with the assistance of clients with accessibility needs are undertaking a review of our sites.

Customer Service

RCHS has two new sites which were developed in the last year. Each of these sites was developed in accordance with AODA Accessibility Standards.

- Perth Site; Sunset Boulevard
- Brockville Site; Strowger Boulevard
- Installation of a new reception area in the Smiths Falls site for increased security and is AODA compliant
- Addition of accessibility paddles on washroom doors in the Merrickville site

Feedback

- Updated the client feedback process to allow clients to provide comments through the website, by email, phone, on site comment cards or in-person.
- Based on feedback we are evaluating waiting room spaces to ensure optimal space for clients with mobility devices based on feedback received

Information and Communications

- Converted existing emergency and public safety information into a digital file for easy conversion to accessible formats.
- We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports.
- Interpreter Supports if requested
- Access to TTY for those with hearing impairment

For more information about Ontario's Customer Service Standard, visit ontario.ca/accessibility.

Employment

We have AODA and Customer Service Training as part of our annual mandatory All Staff Day training. This is in addition to these topics being part of orientation for all new staff and volunteers.

4.2 SECTION TWO: Strategies and Actions

Identify the projects and programs your organization plans between now and 2022 to meet the requirements of the Accessibility for Ontarians with Disabilities Act and to remove and prevent barriers to people with disabilities.

Customer Service

Rideau Community Health Services is committed to providing accessible customer service to people with disabilities. This means that we will provide goods and services to people with disabilities with the same high quality and timeliness as others.

Information and Communications

Rideau Community Health Services is committed to making our information and communications accessible to people with disabilities.

- Planned Website update for 2020 to make it Web Content Accessibility Guidelines (WCAG) 2.0 Level AA compliant- **September 2020**

Employment

Rideau Community Health Services is committed to fair and accessible employment practices as per updated Employment Policy GEN 224.

1. Specific Directives - Integrated Accessibility Standards Regulation (IASR) Employment Standard
2. We will notify employees, potential hires and the public that accommodations can be made during recruitment and hiring.
3. We will notify staff that supports are available for those with disabilities. We will put in place a process to develop individual accommodation plans for employees.
4. Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

All employment services provided by RCHS shall follow the principles of dignity, independence, integration and equal opportunity. RCHS is committed to fair and accessible employment practices. We will take the following steps to notify the public and staff that, when requested,

- a. RCHS will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.
- b. RCHS will develop individual accommodation and return-to-work plans for employees that have been absent due to a disability.
- c. RCHS will ensure the accessibility needs of employees with disabilities are taken into account when considering performance management, career development and redeployment processes.
- d. RCHS will take steps to prevent and remove other accessibility barriers identified.
- e. RCHS will respond to requests for accommodation under the *Ontario Human Rights Code*
- f. Management specific training on IASR and the Human Rights Code will be completed in **January 2020**

RCHS will continue to meet the standards set by the Ontario Human Rights Code. Where a request for accommodation is made, RCHS will strive to provide accommodation and work with the person requesting the accommodation in a way that most respects the dignity of the person. RCHS recognizes that people with disabilities may require individualized accommodation and that each person's needs are unique. Accommodation will be provided unless RCHS experiences "undue hardship" as defined in the Code.

5.0 TRAINING

All staff, volunteers, students and Board Directors of the Centre will receive training and orientation to the AODA Integrated Accessibility Standards, the Ontario Human Rights Code and AODA policies, procedures, and practices governing the provision of goods and services to persons with disabilities. This training will be provided on orientation and updated annually. The training will also be provided on an ongoing basis in connection with any changes to policies, procedures, and practices.

- 5.1 Training will be provided to staff based on the position's job requirements
- 5.2 Training will be provided to volunteers
- 5.3 Training will be provided to people developing our organization's training policies.
- 5.4 Staff will be trained on an ongoing basis when changes are made to the policies, practices and procedures.
- 5.5 RCHS will keep records of the training provided, including dates training is provided and the number of persons trained.
- 5.6 For every new hire, training will be provided on orientation to their duties.
- 5.7 Training will include the following:
 - a. The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard;
 - b. The requirements of the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code;
 - c. How to provide goods and services in a manner that respects the dignity and independence of persons with disabilities;
 - d. How to interact and communicate with persons in a manner that takes into account their disabilities;
 - e. How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person to access goods or services;
 - f. How to use equipment or devices available on RCHS premises or provided by RCHS that may help with the provision of goods and services to persons with disabilities;
 - g. What to do if a person with a disability is having difficulty accessing the RCHS' goods and services;
 - h. Information on other policies, practices and procedures dealing with the AODA;
 - i. The process for people to provide feedback about its provision of goods and services to persons with disabilities and how we respond to the feedback and actions taken on any complaint.

[GEN 226 – Training](#)

6.0 FEEDBACK PROCESS

To assist RCHS in ensuring that the delivery of goods and services to those with disabilities is provided in an effective and timely manner, clients, volunteers, families and staff are invited to provide their feedback as follows:

In writing, in person, fax, e-mail or telephone, comment cards (located at each site) addressed to:

Rideau Community Health Services
354 Read Street
Merrickville, ON
K0G 1N0

Telephone: 613-269-3400 ext. 224

Fax: 613-269-4958

Email: mbellows@rideauchs.ca

Website: www.RCHS.on.ca

TTY Relay Services: 1-800-855-0511 and connect to our local number 613-269-3400

The CEO and/or designate will respond either in writing, in person, by e-mail or telephone acknowledging receipt of feedback and will set out the action to be taken in response to any complaints. A response will be provided within 14 days.

[SD 300 – Client Feedback Comments, Compliments and Complaints](#)

7.0 BARRIER-IDENTIFICATION

Our Working Group used the following barrier-identification methodologies to address areas of improvement.

Methodology	Description	Status
Canvas Management and staff	Leadership Team and Occupational Health & Safety for input and ideas from them.	Completed will remain on Agendas Quarterly
Engagement with Community members and families with persons with disabilities	Worked with families and clients with disabilities and plan to work with our new Community Engagement Council	Ongoing work with Clients and Families- feedback has been received in December and will continue with new Community Engagement Council
Surveys/Questionnaire	We enable surveys across all programs and services	Ongoing

Updated Feedback Policy	Policy has been updated to increase methods of feedback to the organization. The feedback is responded to as per policy SD 300	Analysis of feedback in undertaken and reported to the Board of Directors on a quarterly basis
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RCHS will review potential barriers that may still exist. RCHS will use its new Community Council to help with this identification process. A plan will be put into place to attend to any barrier that may be identified at that time.

8.0 BARRIERS IDENTIFIED

Barrier Type	Location	Description	Measures implemented
Physical Barrier:			
Entrances	Waiting Areas in Smiths Falls and Brockville	Identified spaces as "tight" when we have specialty clinics related to number of wheelchairs	Evaluate the flow on days where we know we will have high volume of assistive mobility devices in waiting areas
Parking/lighting	SF	Back Lot request for increased lighting	Request has gone to Building Owners for quote
Architectural Barriers:			
Entrance	Merrickville	Uneven Flooring	This is being completed before March 2020
Doors	Merrickville	Additional electronic Paddles	This is being completed before March 2020
Informational Barriers: None Identified			
Communication Barriers: None identified			

Attitudinal Barriers: This has been identified as an area where RCHS excels in inclusion. Clients and families have identified and continue to identify the positive experiences they have at our sites and positive interactions with staff.

Review and monitoring process

The RCHS Multi-Year Plan will be reviewed annually and updated every five years. This current plan covers the period of 2017-2022.

Communication of the plan

The accessibility plan will be available on RCHS's web site (www.RCHS.ca) and copies of the plan and policies will be available if requested at each site. On request, the report will be made available, in large print, or in audio format or we will work with the person requesting to provide a format that meets their needs.

Communicating with People with Disabilities:

The Centre is committed to offering programs and services to persons with disabilities. Upon request the Centre will provide accessible formats and communication supports. The Centre will consult with the person making the request to determine their accessible information and communication needs.

[GEN 222 – Communicating with People with Disabilities](#)

Use of Assistive Devices:

The Centre is committed to ensuring clients with disabilities who access our services, and anyone with a disability who visits our sites, will be able to use their assistive devices within the limits of any applicable privacy, health and safety laws or regulations.

[GEN 218 – Use of Assistive Devices](#)

Support Persons:

The Centre is committed to allowing full access to our services and premises to people with disabilities and their support persons.

[GEN 217 –Support Persons](#)

Guide Dogs and Service Animals:

The Centre is committed to allowing full access to our services and premises to people with disabilities and their service animals wherever possible.

[GEN 219 – Service Animals](#)

Notice of Disruption:

If there is a disruption to the usual facilities or attached services that the Centre provides to people with disabilities that impacts access (e.g., accessible washrooms, ramps, accessible parking spaces, automatic doors, TTY services, etc.), the Centre will provide notice of such disruption as far in advance as possible through a variety of communication formats.

[GEN 221 – Notice of Disruption in Service](#)

Policy:

Rideau Community Health Services is accountable to employees, clients and to the government of Ontario for meeting the standards set by the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) and its regulations. RCHS will maintain a multi-year accessibility plan that outlines steps to remove and prevent accessibility barriers.

Please refer to individual policies for further information on topics.

Accessibility Statement:

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 by meeting our accessibility requirements under Ontario’s accessibility laws.

RCHS welcomes and encourages people living with disabilities to use our services. RCHS will provide access to our services for people with disabilities in a way that respects their right to dignity, independence and integration.

RCHS uses the definition of disability in the AODA.

The AODA 2005 adopts the broad definition for disability that is set out in the *Ontario Human Rights Code*. “Disability” is:

- 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 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*.

RCHS strives to provide service to everyone in a welcoming and supportive environment. RCHS will consider the individual needs of people with disabilities in delivering service by:

- Considering individual and special needs when applying the RCHS policies and procedures

- Communicating with people in a way that meets their needs
- Welcoming feedback and suggestions about services in a variety of formats
- Welcoming accompanying support people
- Offering a range of assistive devices such as wheelchairs
- Welcoming service animals
- Letting people know if services are not available where possible, for example, if a program is going to be closed or if the website is not available
- Ensuring that emergency responses address accessibility
- Training employees and volunteers to provide the best possible service
- Providing a forum for addressing concerns or challenges associated with accessing our services including phone number and key contact information
- Providing opportunities for continuous improvement and regular review of accessibility policies and procedures

Multi-Year Plan (“the Plan”):

RCCHS Multi-Year Accessibility Plan outlines the specific measures RCCHS will take to prevent and remove barriers in the workplace and to improve opportunities for persons with disabilities.

The Multi-Year Plan will be reviewed and updated every five (5) years and is posted on RCCHS website. Upon request, RCCHS will provide a copy of the Plan in an accessible format.

Training for employees and volunteers:

RCCHS will continue to train employees and volunteers in Ontario’s accessibility laws (AODA), its regulations and aspects of the Ontario Human Rights Code that relate to persons with disabilities. Training will be completed on orientation and annually and is considered mandatory.

This training will be appropriate to the duties of employees, volunteers, other persons and board directors.

Training will also be provided when any changes are made to RCCHS accessibility policies or legislative amendments.

The training will be provided as soon as practicable and in respect to any changes to the following individuals:

- all persons who are an employee of, or a volunteer with, the organization;
- all persons who participate in developing the organization’s policies; and
- all other persons who provide goods, services or facilities on behalf of the organization

Records of training including the dates and number of individuals to whom the training was provided will be kept on file.

Communication

Program employees and volunteers will communicate with people with disabilities in a way that takes their needs into consideration. We can utilize several methods of communications which include:

- newsletters
- emails
- memos
- websites
- bulletin boards
- staff meetings
- one-on-one conversations

If alternative means of communication are required RCHS will work with the person(s) to enable appropriate communications.

Feedback process

RCHS welcomes client feedback and makes information available to all clients on how to provide feedback. Feedback is accepted by RCHS in a variety of formats. Employee assistance is available to support all clients, including people with disabilities, in providing feedback.

Requests for Accommodation under the Ontario Human Rights Code

RCHS will continue to meet the standards set by the Ontario Human Rights Code. Where a request for accommodation is made, RCHS will strive to provide accommodation and work with the person requesting the accommodation in a way that most respects the dignity of the person. RCHS recognizes that people with disabilities may require individualized accommodation and that each person's needs are unique. Accommodation will be provided unless RCHS experiences "undue hardship" as defined in the Code.

Emergency Information

Upon request emergency procedures, plans or public safety information prepared by RCHS, will be made available to the public, and will be provided in an accessible format or with appropriate communication supports as soon as practicable.

Specific Directives - Customer Service Standard

a. Provision of Services

RCHS will provide services in a manner that respects the dignity and independence of people with disabilities and integrate services for people with disabilities. RCHS understands that equitable access sometimes requires different treatment including separate or specialized services. However, such

services will be offered in a way that respects the dignity and full participation of people with disabilities.

b. Service Animals

RCCHS continues to welcome service animals that are needed to assist people with disabilities.

c. Support People

RCCHS welcomes people with disabilities and support people who accompany them.

d. Assistive Devices

RCCHS will make reasonable efforts to permit the use of assistive devices that enable people with disabilities to use RCCHS services. RCCHS defines an assistive device as a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities such as moving, communicating or lifting (examples include, walkers, magnifiers for reading, etc.). RCCHS also recognizes that accessibility can be achieved and provided in different ways.

e. Employee Training

Under the AODA legislation, RCCHS will provide employees with accessibility standard training. We are committed to training staff and volunteers in Ontario's accessibility laws and aspects of the Ontario Human Rights Code that relate to persons with disabilities. We will train our employees and volunteers on accessibility as it relates to their specific roles

f. Notice of Temporary Service Disruption

RCCHS will provide notice of service disruptions in services which affect clients with disabilities, which include the reason for the disruption, how long the disruption will last and a description of available alternatives, if any. In the event of an unplanned disruption, notice will be provided as quickly as possible.

g. Information and Documentation on Accessible Customer Service

RCCHS will document its policies, practices and procedures as required. Members of the public will be notified of the availability of this documentation which will be available on the organization's website.

Specific Directives - Integrated Accessibility Standards Regulation (IASR) **Employment Standard**

All employment services provided by RCCHS shall follow the principles of dignity, independence, integration and equal opportunity. RCCHS is committed to fair and accessible employment practices. We will take the following steps to notify the public and staff that, when requested, RCCHS will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.

- a. RCHS is committed to accessible and fair employment practices. RCHS will notify employees and the public about the availability of accommodations for job applicants with disabilities in RCHS' recruitment process.

Assessment or Selection – when a job applicant has been selected to participate further in an assessment or selection process, RCHS will notify the job applicant that accommodations are available, upon request, in relation to the materials or processes to be used in the assessment or selection process.

If a job applicant requests accommodation during the assessment or selection process, RCHS will consult with the job applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the job applicant's accessibility needs due to disability.

Notice to Successful Applicants - When making offers of employment RCHS will notify the successful job applicant of RCHS' policies for accommodating employees with disabilities. This information will also be included during the new employee's orientation.

- b. We will notify staff that supports are available for those with disabilities. We will put in place a process to develop individual accommodation plans for employees.
- c. Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

Documented Individual Accommodation Policy

RCHS will develop individual accommodation and return-to-work plans for employees that have been absent due to a disability. RCHS maintains a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports will also be included in individual accommodation plans. In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

Accessible Formats and Communication Supports

RCHS shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports 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.

RCHS shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

The individual accommodation plan shall also indicate the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Workplace Emergency Response Information

RCCHS shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, RCCHS shall provide the workplace emergency response information to the person designated by RCCHS to provide assistance to the employee.

RCCHS shall provide the information as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.

RCCHS shall 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
- c. When RCCHS review its general emergency response policies; and
- d. Upon change in the status of the employee or upon the request of the employee or RCCHS

Return to Work Process

RCCHS maintains a documented return to work process for its employees who have been absent from work due to disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps RCCHS will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

RCCHS will ensure the accessibility needs of employees with disabilities are taken into account when considering performance management, career development and redeployment processes.

RCCHS will take steps to prevent and remove other accessibility barriers identified.

Specific Directives: Integrated Accessibility Standards Regulation (IASR) Information and Communications Policy

RCCHS is committed to meeting the communication needs of people with disabilities. RCCHS will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

We will communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its

services, including public safety information, in accessible formats or with communication supports.

- a. RCHS will ensure existing feedback processes are accessible to people with disabilities upon request.
- b. RCHS will ensure all publicly available information is made accessible upon request. Unless deemed unconvertible, RCHS will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual. Accessible formats include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities. Communication supports include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- c. RCHS will ensure its website and content conform with WCAG 2.0, Level AA by January 1, 2021.
- d. The Information and Communications Standard does not apply to:
 - Products and product labels;
 - Unconvertible information or communications: If it is determined, in consultation with the requesting party, that information or communications are unconvertible, RCHS will ensure that the individual who made the request is provided with an explanation and a summary of the information. RCHS will classify information or communications as unconvertible where:
 - It is not technically practicable to convert; or
 - The technology required to make the conversion is not readily available.
 - Information that the organization does not control either directly or indirectly through a contractual relationship.

Specific Directives: Integrated Accessibility Standards Regulation (IASR) Design of Public Spaces

RCHS will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals
- Accessible off street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

RCCHS will put procedures in place to prevent service disruptions to its accessible parts of its public spaces. In the event of a service disruption, we will notify the public of the service disruption and alternatives available as soon as possible.

We will modify or remove an existing policy that does not respect and promote the dignity and independence of people with disabilities.

Policy:	Accessibility	GEN 216	
Developed on:	December 2011		
Revised on:	January 2018	December 2019	
Reviewed on:			
Approved on:	December 2019		

Policy: TRAINING

All staff, volunteers, students and Board Directors of the Centre will receive training and orientation to the AODA Integrated Accessibility Standards, the Ontario Human Rights Code and AODA policies, procedures, and practices governing the provision of goods and services to persons with disabilities. This training will be provided on orientation and updated annually. The training will also be provided on an ongoing basis in connection with any changes to policies, procedures, and practices.

Procedure:

- 5.1 Training will be provided to staff based on the position's job requirements
- 5.2 Training will be provided to volunteers
- 5.3 Training will be provided to people developing our organization's training policies.
- 5.4 Staff will be trained on an ongoing basis when changes are made to the policies, practices and procedures.
- 5.5 RCHS will keep records of the training provided, including dates training is provided and the number of persons trained.
- 5.6 For every new hire, training will be provided on orientation to their duties.
- 5.7 Training will include the following:
 - a. The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard;
 - b. The requirements of the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code;
 - c. How to provide goods and services in a manner that respects the dignity and independence of persons with disabilities;
 - d. How to interact and communicate with persons in a manner that takes into account their disabilities;
 - e. How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person to access goods or services;
 - f. How to use equipment or devices available on RCHS premises or provided by RCHS that may help with the provision of goods and services to persons with disabilities;
 - g. What to do if a person with a disability is having difficulty accessing the RCHS' goods and services;
 - h. Information on other policies, practices and procedures dealing with the AODA;

- i. The process for people to provide feedback about its provision of goods and services to persons with disabilities and how we respond to the feedback and actions taken on any complaint.

Policy:	Training AODA IASR	GEN 226
Developed on:	December 2019	
Revised on:		
Reviewed on:		
Approved on:	December 2019	

Policy:

RCCHS is committed to welcoming feedback, both positive and negative from the clients and community it serves.

Preamble:

Feedback in the form of comments, compliments and complaints from clients and the community is used to guide program and service delivery. Clients and the members of the community are made aware of their right to provide feedback at RCCHS. This information is provided on our website, in written documentation, on waiting room monitors and in our client orientation. RCCHS tracks, monitors and responds to client feedback

Definitions:

Comment – can be described as a personal opinion or belief about someone or something

Compliment – an expression of praise, admiration or congratulation

Complaint or negative feedback is an objection to something that is perceived as unfair, unacceptable or otherwise felt not up to standards.

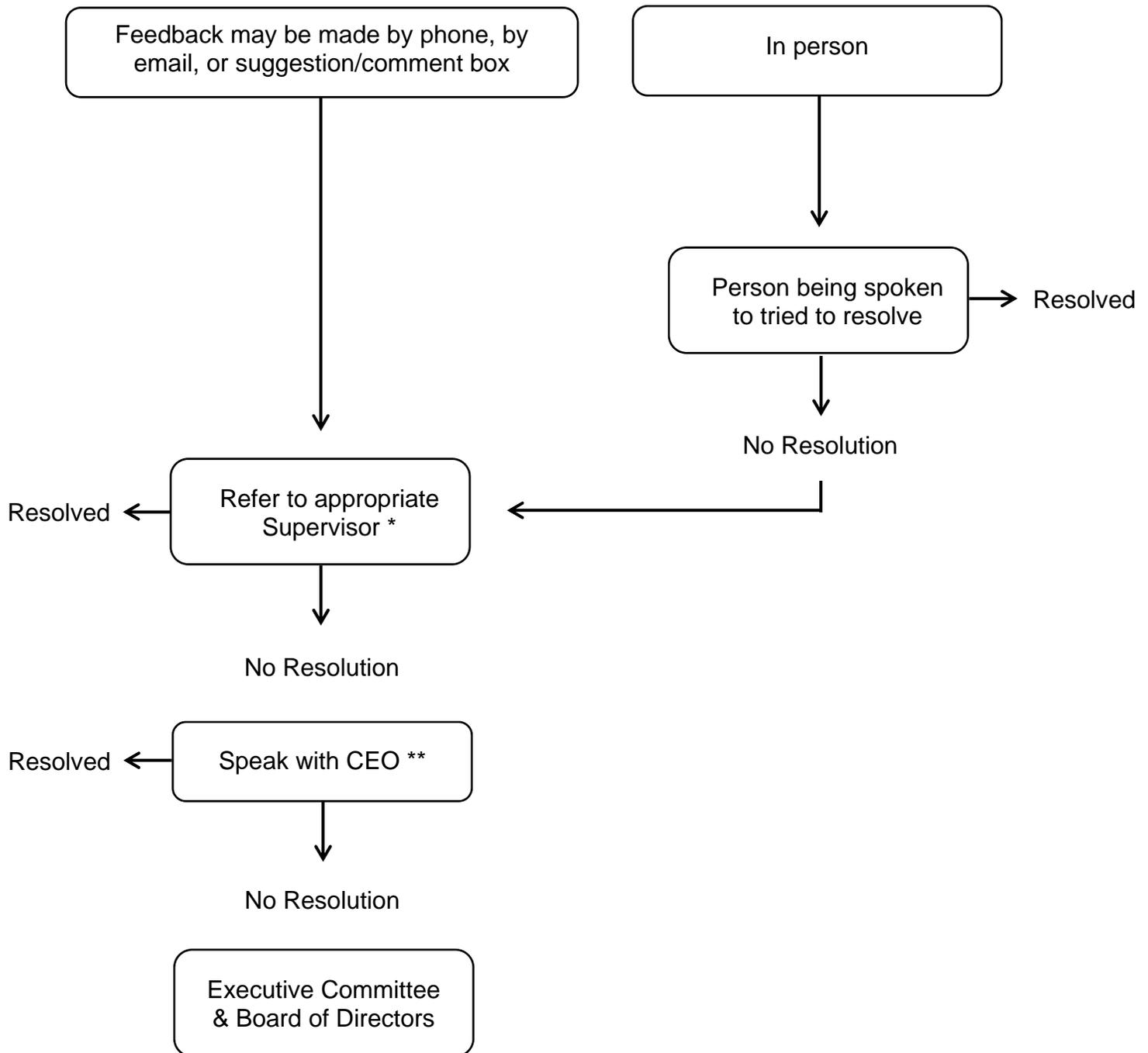
1. **Procedure:** Clients have several options for bringing feedback to the attention of RCCHS. Anonymous feedback will also be reviewed via:
 - a. suggestion mailboxes.
 - b. speaking with employees.
 - c. Written email or letter
2. All feedback in the form of a complaint is investigated and responded. Employees shall make every effort to resolve complaints as they arise and if necessary, escalate to the attention of the Supervisor. If required to resolve the matter to the satisfaction of the complainant we will:
 - a. Investigate the circumstances surrounding the complaint
 - b. Notify the employee involved that a complaint has been made if appropriate.
 - c. Notify the appropriate college or agency as required of complaint and actions taken. Make sure the complaint is well documented, if complaint is related to client care, ensure the complaint and any communication with the client is well documented in the client chart.
 - d. Report back any resolution to both the client and any employee involved within a reasonable time frame.
3. Feedback received via email/mail should be responded to in an expedient manner by the appropriate staff member, Supervisor. We should communicate that we have received their concern and would like to communicate with them directly to receive further information (if indicated) and discuss the concern.

4. If a complaint pertains to a Manager, direct the complainant to their Director; if a complaint is regarding the Director direct the complaint to the CEO and if the complaint is regarding the CEO, direct the complainant to the Director of Corporate Services who will communicate with the Chair of the Board of Directors.

The Board Chair or designate will make every effort to resolve the matter to the satisfaction of the complainant by:

- Notifying the CEO that a complaint has been made
 - Investigating the circumstances surrounding the complaint
 - Reporting to both the complainant and CEO a recommended course of action
 - Completing this process within 14 days.
5. If an investigation is required it is the expectation that a response will be available within 14 days. Where this is not possible, the Supervisor will let the client/ community member know when a full response will be available.
 6. Negative feedback regarding the care received from a RCHS Health professional, will be investigated and if necessary may be directed to the relevant Professional College for regulated health professionals if required as per Policy SD 150: Reporting a Colleague.
 7. If the issue is not resolved, the CEO may inform the Executive Committee to determine the next steps required.
 8. The Management team maintains an excel spreadsheet to record client feedback in the shared drive.
 9. Only where appropriate, the complaint/problem is recorded in the client record. Documentation will include:
 - a. the nature of the problem.
 - b. the precipitating circumstances.
 - c. how the problem/issue was addressed.
 - d. the client’s satisfaction.
 10. Client feedback is shared with RCHS Board of Directors in CEO Report quarterly.

Policy:	Complaints			SD 300
Developed on:	November 2002			
Revised on:	October 2013	November 2014	December 2016	
Revised on:	June 2019			
Reviewed on:				
Approved on:	June 2019			



* If feedback is regarding Manager/Director, send directly to CEO.

** If feedback is regarding CEO, send directly to Director of Corporate Services and Board Chair.

Policy:

Rideau Community Health Services (RCHS) is committed to effectively communicating with people with disabilities.

Application:

This policy applies to:

- All staff, volunteers, students, contractors, consultants and others working on behalf of RCHS and who communicate with clients, consumers and the public.
- Staff, board members, volunteers and others who are involved in developing policies and procedures regarding the standard

Procedures:

We ensure that RCHS will do this by:

- Giving consideration to individual disabilities when communicating
- Educating staff, students, volunteers and others about providing effective ways of communicating with people with disabilities
- Using appropriate language when referring to people with disabilities and taking action when unacceptable terms are used
- Soliciting feedback about our communications from clients, consumers, experts and others
- Keeping current with communication technology and standards for people with disabilities.

RCHS will develop and enforce communication criteria that provide a range of options to make all communication more accessible to people with disabilities. We will do this by

- Adopting current best practices whenever possible
- Educating staff, students and volunteers about best methods to use when communicating with individuals having disabilities

When possible, RCHS will provide aids that are used to help people with a disability communicate for use within RCHS (e.g., text readers, amplifiers, screen magnifiers, and interpretation).

Staff, students and volunteers will communicate with clients over the telephone and in person in clear and plain language.

When possible, RCHS will offer alternative formats for communication in order to address the needs of people with disabilities (e.g. large print, Braille, etc.).

Definitions:**Assistive Communications Devices**

Assistive communication devices can be software or aids that are used to help people with a disability communicate. Examples of assistive communication devices are: text readers, amplifiers, screen magnifiers, captioning and interpretation.

Communication

A process of providing, sending, receiving and understanding information.
Communication is a two-way exchange.

Disability

The definition of “disability” can be found under the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

Formats

Describe medium used such as CD, electronic or paper.

Standard

Means the Accessibility Standards for Customer Service.

Limitations:

This policy does not cover

- Internal communications
- Communications that are from third-parties which we forward to others
- Communications that are under copyright and cannot be altered by our organization.

Policy:	Communicating With People With Disabilities	GEN 222
Developed on:	December 2019	
Revised on:		
Reviewed on:		
Approved on:	December 2019	

Policy:

Rideau Community Health Services (RCHS) is committed to ensuring clients with disabilities who access our services and anyone with a disability who visits our sites will be able to use their assistive devices within the limits of any applicable privacy, health and safety laws or regulations.

Procedure:

We ensure this by

- Using reasonable efforts to ensure clients, consumers and visitors with disabilities and who use assistive devices are treated with dignity, independence, and equality of opportunity
- Educating staff about personal assistive devices
- Allowing clients, consumers and people with disabilities who use our services or visit our site to use their personal assistive devices.

Definitions:

Alternative Ways

Means ways of helping clients, consumers or visitors with disabilities access our premises or services when they are unable to use their own assistive devices.

Alternative ways must consider the principles defined in this policy.

Assistive Devices

Assistive devices may be devices that people bring with them, such as walkers, magnifiers, or oxygen tanks. Assistive devices that an organization might provide include: assistive software for people with visual, hearing or mobility impairments, wheelchairs or TTY (telephone teletype), real-time captioning or assistance from a staff person.

Disability

The definition of “disability” is used in the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

Principles:

The principles of this policy are from the standard and require service providers to use reasonable efforts to ensure policies, procedures and practices are consistent with

- Respecting the dignity and independence of people with disabilities
- Providing services to people with disabilities that are integrated with the services

Policy:	Use of Assistive Devices	GEN 218
Developed on:	December 2019	
Revised on:		
Reviewed on:		
Approved on:	December 2019	

Policy:

Rideau Community Health Services (RCHS) is committed to allowing full access to our services and premises to people with disabilities and their support persons.

Application:

This policy applies to

- All staff, volunteers, students, contractors, consultants and others working on behalf of and/or in partnership RCHS and who provide client services
- Staff, board members, volunteers and others who are involved in developing policies and procedures regarding the standard

Procedures:

We will ensure this by:

- Allowing full access to our premises to people with disabilities and their support persons, unless that area of the organization is not open to the public or other third parties or it is unsafe to do so.
- Ensuring the person with a disability and their support person are able to enter our premises together and that the person with a disability has access to their support person at all times while on RCHS's premises.
- Understanding that the decisions to have the support person accompany the client into the service area is at the discretion of the client. When clients access services and programs and request that their support person accompany them into the service area, it is implied that the client has provided consent and that the client's support person understands and commits to the confidentiality of the client's personal health information.
- Educating and training staff, volunteers, students and others who provide service to the public about the role of support persons for those with a disability and the accommodations for accessing RCHS's sites.
- Including in our publications and website where appropriate that we welcome people who are accompanied by support persons.

Definitions:Premises

All locations under the control of RCHS including satellite locations.

Support Person

A support person is a person who assists an individual with a disability to lead a self-directed life and who accompanies them in order to help with communication, mobility, personal care, medical needs or access to goods or services. This may be a professional, relative, volunteer, or friend.

Limitations:

This policy does not cover:

- Events held on RCHS premises that are not sponsored by us.
- RCHS events held off premises over which RCHS has no control.

Policy:	Support Persons Policy	GEN 217
Developed on:	December 2019	
Revised on:		
Reviewed on:		
Approved on:	December 2019	

Policy:

Rideau Community Health Services (RCHS) is committed to allowing full access to our services and premises to people with disabilities and their service animals wherever possible.

Procedures:

We will ensure this by:

- Allowing full access to our premises, unless that area of the organization is not open to the public or other third parties or animals are excluded by other laws such as public health (e.g. Teaching kitchens)
- Educating staff, volunteers, students and others dealing with the public about the use of service animals.
- Providing training to staff, volunteers, students and others dealing with the public on how to interact appropriately with people with disabilities who are accompanied by a service animal.
- Assisting people with disabilities who are accompanied by a service animal when they request help with their animal if it is safe and reasonable to do so.
- Ensuring health regulations concerning service animals are posted in any area where food is prepared and served.
- Providing other measures to access our services for people with disabilities if their service animal is excluded by law from certain areas of our premises.

Definitions:Service Animal

An animal is qualified to be a service animal if it is readily apparent the animal is used by the person for reasons relating to his/her disability; or the person provides a letter from a medical practitioner confirming the person requires the animal for reasons relating to the disability.

Premises

All locations and facilities under the control of RCHS.

Limitations:

This policy does not cover:

- RCHS events held off premises over which RCHS has no control.
- Animals that do not fall under the definition of "service animal".

APPLICATION

This policy applies to

- All staff, volunteers, students, contractors, consultants and others working on behalf of RCHS and who provide client services Staff, board members, volunteers and others who are involved in developing policies and procedures regarding the standard

Policy:	Service Animals	GEN 219
Developed on:	December 2019	
Revised on:		
Reviewed on:		
Approved on:	December 2019	

Policy:

Rideau Community Health Services (RCHS) will provide notice on disruptions in our facility services to people with disabilities. In the event that there is a disruption in the usual facilities or services that RCHS provides to people with disabilities that impacts access (e.g. Accessible washrooms, ramps, accessible, parking spaces, automatic doors, TTY services, etc.), we will provide notice of such disruption as far in advance as possible, through a variety of means.

Procedures:

When service disruptions are planned or anticipated (e.g. Routine maintenance or upgrades) notices of the disruption will be posted in advance by the person overseeing the process.

When service disruptions are not anticipated (e.g., sudden malfunctions), notices of service disruption will be posted as soon as the disruption occurs by the person overseeing the process.

All notices regarding service disruptions will, where relevant

- Note the reasons for the disruption
- Note how long service is expected to be disrupted
- Be posted in conspicuous places where people with disabilities can easily access the information such as: on the door to the premises, on bulletin boards throughout the building, on the website
- Direct clients to alternative ways to access the service

In the event of both anticipated and unanticipated service disruptions, alternative means of providing the service will be offered, where possible.

Policy:	Notice of Disruptions in Service	GEN 221
Developed on:	December 2019	
Revised on:		
Reviewed on:		
Approved on:	December 2019	