



POLICY:	CTN COMPLIANCE WITH ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT		
POLICY NUMBER:	ACCESSIBILITY	DATE APPROVED:	MARCH 21, 2017
DOCUMENT OWNER:			
APPROVER:	Chief Executive Officer	DATE REVIEWED/REVISED:	

PURPOSE	<p>Children's Treatment Network of Simcoe York (CTN) has an obligation to meet the requirements of the <i>Accessibility Standard for Customer Service, Ontario Regulation 429/07</i> and the <i>Integrated Accessibility Standard 191/11</i> under the <i>Accessibility for Ontarians with Disabilities Act, 2005 (AODA)</i>.</p> <p>This Policy and Procedure details the requirements for CTN to comply with AODA.</p>
APPLICATION	<p>This Policy and Procedure applies to all CTN employees, volunteers and Board members.</p> <p>Accessibility, in accordance with the AODA applies to all CTN: clients, employees, volunteers, Board members and members of the public accessing CTN sites or resources.</p> <p>Definition: <u>Disability</u></p> <p>(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 on a wheelchair or other remedial appliance or device,</p> <p>(b) a condition of mental impairment or a developmental disability,</p> <p>(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,</p> <p>(d) a mental disorder, or</p> <p>(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the <i>Workplace Safety and Insurance Act, 1997</i>; ("handicap").</p> <p><u>Assistive Devices</u> are auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).</p>



	<p><u>Support Persons</u> are any persons, whether a paid professional, volunteer, family member, or friend, who support a person with a disability in order to help with communications, personal care or medical needs, or with access to goods or services.</p> <p><u>Service Animals</u> are animals individually trained to do work or perform tasks for the benefit of a person with a disability.</p> <p><u>Reasonable Accommodation</u>: modifications or adjustments which are not unduly burdensome, that assist persons served or staff members to access benefits and privileges enjoyed by others. Examples include: making existing facilities accessible and usable by persons with disabilities; modifying work schedules; acquiring or modifying equipment or assistive devices; training materials; providing interpreters.</p> <p><u>CTN Representative</u> means every person who deals with members of the public or other third parties on behalf of CTN, whether the person does so as an employee, agent, volunteer or otherwise.</p>
POLICY	<p>Children's Treatment Network of Simcoe York (CTN) has a commitment to accessibility for: clients, employees, volunteers, Board members and members of the public accessing CTN sites or resources.</p> <p>Building on a foundation of our commitment to accessibility, CTN works with children, their families, employees, volunteers and partners to identify, prevent and remove barriers to participation for all and to ensure compliance with the Customer Service Standard and the Integrated Accessibility Standards. This occurs at both the individual and agency level.</p> <p><u>Assistive Devices</u>: All persons with disabilities are enabled to use their assistive devices at all of the CTN facilities. CTN Representatives will be aware of various assistive devices that may be used by clients with disabilities while accessing services</p> <p><u>Communications</u> with a person with a disability will be conducted in a manner that takes the person's disability into account. CTN Representatives will be trained to interact and communicate with customers with various types of disabilities:</p> <ul style="list-style-type: none">• employees trained to communicate with clients in clear, plain language speaking clearly and slowly;• customers will be offered various communication modes and where needs cannot be accommodated by CTN technology, the services of CTN partners will be engaged.



Service Animals: CTN welcomes children and their families who are accompanied by a trained, accredited service animal. A service animal may accompany a child, family member or any third party with a disability to all parts of our premises that are open to the public. Although service animals are commonly dogs, other animals can be used. Service animals may be readily apparent by their appearance or behaviour or the owner may carry documentation from a regulated health professional.

Support Persons: CTN welcomes anyone who is accompanied by a support person. Any individual who is accompanied by a support person is allowed to enter CTN's premises with his or her support person. At no time will an individual who is accompanied by a support person be prevented from having access to his or her support person while on CTN premises.

Temporary Disruption of Service: CTN is aware that temporary disruptions of services (daily functions – elevators, physical operations) and programs may occur due to reasons that may or may not be within CTN's control or knowledge. CTN takes reasonable steps to provide advance notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that may be available.

Receiving and Responding to Feedback: CTN has a Complaints Policy and Procedure in place that addresses feedback for how services are provided to children with multiple special needs and their families.

Customer Service Training: CTN confirms/provides training to all CTN employees, representatives and volunteers on accessible customer services and how to interact with people with different disabilities. AODA compliance is reported to the board annually.

Feedback regarding the way CTN provides services to people with disabilities is welcome and appreciated. Feedback may be provided by telephone, in writing, in electronic format or through other means.

Posting of Documents: Notices are posted at all CTN sites, informing the public that the documents required by the Customer Service Standard and Integrated Accessibility Standards are available upon request and will be provided in a format that takes a person's disability into account.

CTN provides means for individuals to request reasonable accommodation and a process to review, approve and develop individual accommodation plans.



PROCEDURE	<p>Assistive Devices:</p> <ul style="list-style-type: none">• CTN representatives are aware of the various assistive devices that may be used by people accessing our services;• Wheelchairs are available at selected sites;• Local Team Sites and Clinical Services:<ul style="list-style-type: none">i. Clinical services are provided through contract agreements with Host Agencies for Regulated Health Professionals, Allied Health Professionals and support personnel;ii. The CTN contract with providers requires the Host Agency to ensure that the professionals have licenses; specific scopes of practice; and training in the use of assistive devices as applicable;iii. Prior to use of a local team site, each clinical professional/volunteer is required to complete the CTN Local Team Site-specific Orientation and the Use of Facilities and Equipment Waiver Form-Provider to ensure the safe use of equipment and facilities.• Corporate Services:<ul style="list-style-type: none">iv. Non-clinical employees are trained to interact with people that use assistive devices including but not limited to:<ul style="list-style-type: none">○ Hearing assistive devices;○ Live descriptive services for persons with visual impairment;○ Mobility Devices. <p>Communications</p> <p>Access to communication for persons with disabilities should be as effective as that provided to persons without disabilities. When considering ways to improve general communications, people with a disability will be involved in consultation, or in meetings. CTN uses a variety of ways, wherever possible, to make communications more accessible by:</p> <ul style="list-style-type: none">• Considering the needs of children with multiple special needs and their families during the planning stage of services;• Using plain language to make a document easier to read for people with certain learning disabilities;• Using people first language;• Offering information in alternate formats, upon request including:<ul style="list-style-type: none">○ augmentative communication methods and strategies;○ braille;○ printed hand-outs of commonly used information;○ large print;○ sign language interpretation;○ E-mail as an alternate channel to provide accessible communication within the parameters allowable by privacy legislation;• asking before offering to help;
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- speaking normally, clearly and directly;
- speaking directly to the person, not to their interpreter or support person.

Service Animals

Guide dogs or other service animals, including service animals in training, are allowed to accompany people with disabilities on CTN premises open to the public.

- If the service animal is causing a disturbance, the person and accompanying service animal may be required to leave the area or CTN premises. CTN ensures that alternate measures are available to enable clients to access our services in this event;
- The owner is responsible to properly supervise their service animal;
- CTN anticipates there will be special situations and is prepared to make every effort to accommodate the circumstances on an individual basis, as they arise, keeping safety to all in mind.

Support Persons

Any individual who is accompanied by a support person is allowed to enter CTN's premises with his or her support person.

- At no time will an individual who is accompanied by a support person be prevented from having access to their support person while on CTN premises;
- Clients are informed of this through CTN's communication to the public;
- Support persons are welcomed to access and assist individuals with their personal assistive devices at the CTN;
- Parents or support persons are able to use CTN clinical equipment if they are provided with a time limited treatment plan that has been developed by a therapist. It is the therapist's responsibility to ensure that the family has been trained on the use of the equipment and the treatment plan. Families and support persons will sign a waiver indicating that they understand that they are only to use the equipment that they have been trained on for the purposes of carrying out a therapist's prescribed plan;
- It is necessary to obtain consent of disclosure from the individual prior to discussing or releasing confidential personal information in the presence of a support person. If the individual uses a different support person for subsequent confidential meetings, a new consent will be required.

Temporary Disruption of Service

If a disruption in service (daily functions, elevators, physical operations, programs, etc.) is planned, as much notice as possible will be provided so that alternate arrangements can be made.



Informing Site Users

- Site users have access to contact information should they become aware of a situation that disrupts the use of local team space due to problems with infrastructure, space or equipment:
 - When a problem is identified by a site user they are required to advise the Local Team Facilitator (LTF);
- The site contact person will: post temporary signage and inform the LTF about the problem and prognosis.

Informing Clients

- Site users will reference the SharePoint Booking Calendar and communicate the immediate problem to users for that day;
- The LTF will develop a communication plan if necessary and inform the appropriate Director (e.g. Corporate Services, Programs & Services, or Director on call) ;
- If the disruption is Information Technology related e.g. website problem, helpdesk@ctnsy.ca is contacted. They will initiate the communication plan and provide updates;
- When there is temporary disruption of any service, a notice is made available for broadcasting news and updates through the following networks, as appropriate:
 - www.ctnsy.ca;
 - telephone recordings;
 - E-alert;
 - SharePoint for CTN employees and partners;
 - temporary signage.

In the event of an unexpected disruption, advance notice is not always possible. In such cases, CTN provides notice, as soon as possible, through its communication networks.

Emergency Plan: The site specific Emergency Plan is posted on SharePoint and in each Local Team Site. Upon hiring, each CTN employee is asked to self-declare their need for an individual emergency plan based on a personal disability and the Plan is developed in consultation with their supervisor. Volunteers follow a similar process. Other site users self-declare their need for an individual Emergency Plan when they complete the Local Team Site Orientation. The individual Emergency Accommodation Plan must be linked to the LT Site Emergency Plan. Emergency plans for clients will be developed by their clinicians and documented in the shared electronic record.

Process to Receive and Respond to Feedback

Families are encouraged to discuss their complaints/concerns with their attending clinician(s), SPOC Coordinator or Local Team Facilitator (LTF) for



input/to seek resolution. If the issue is not resolved it should be deemed a formal complaint. The Complaint Policy and Procedure will be followed. The Complaint process is available through:

- CTN web site;
- Signage at CTN locations;
- Parent Handbook;
- Can be provided in other formats if requested.

Employees are encouraged to provide feedback and make suggestions. They also have a Formal Complaints Policy and Procedure to follow should they be unable to come to resolution with their immediate supervisor.

Customer Service Training Related to the AODA

CTN Representatives will be provided AODA training and the Customer Service Standard. New employees receive AODA training as soon as possible, after an employee commences their duties.

Training may include the following components:

- the purposes of the *Accessibility for Ontarians with Disabilities Act* and the requirements of the Accessibility Standards for Customer Service and the relationship to the Ontario Human Rights Code;
- updates to CTN policies and procedures governing the provision of services in accordance with AODA;
- interacting and communicating with people with various types of disabilities;
- interacting with people with disabilities who use an assistive device, service animal or support person;
- instruction on what to do if a person with a disability is having difficulty accessing or participating in our services;
- the use of equipment or assistive devices that may be available at CTN;
- plans for achieving accessibility by 2025.

An evaluation process is in place for continuous improvement in training content and delivery.

Training is recorded in employee and volunteer's files as appropriate. A record of Board Training is recorded in Board minutes.

Posting of Documents

The following documents are to be posted at each CTN site:

- CTN Commitment Statement;
- CTN Compliance with AODA Policy and Procedure;
- The Accessibility Plan;



- Notice informing the public that the documents required by the Customer Service Standard and the Integrated Accessibility Standard are available upon request and will be provided in a format that takes a person's disability into account.

Requests for Reasonable Accommodation

People with disabilities have the right to equal treatment, equal access and the same opportunities as people without disabilities. CTN is committed to providing reasonable accommodation for people with disabilities.

Employees

Employees may make requests for accommodation at the time of hire or at any time during their employment. Requests will be made to the employee's supervisor or the Director of Corporate Services. Some people are unable or unwilling due to fear of stigma and stereotypes to make requests. Employee's supervisor or colleagues may also identify the need for accommodation.

Volunteers

Volunteers will make requests for accommodation to the Family Resource Program Coordinator.

Board Members

Board Members will make requests for accommodation to the CEO.

Clients

The needs (including accommodation) of clients and their families, are identified as part of the services provided.

Review of Accommodation Requests

The person requesting accommodation plays an active role in working with CTN clinicians, supervisors and management to gather information regarding specific requirements for accommodation and the options that may be available. External experts may be involved to determine accommodations required.

Decisions on Accommodation Requests

The Management Team will evaluate and carefully consider the merits of all requests for accommodation to determine what remedial actions can be taken. Both short and long term solutions may be appropriate. Once appropriate accommodation has been identified, the accommodation details are documented in a formal individual plan. Where for financial, safety or operational reasons, the accommodation cannot be made, the CEO will make the final decision and the decision will be discussed with the person.



Documentation of Individual Accommodation Plans

- Individual Accommodation Plans for employees will be kept in the employee file;
- Individual Accommodation Plans for volunteers will be kept in the volunteer file;
- Individual Accommodation Plans for Board members will be kept in the Board file;
- Individual Accommodation Plans for clients will be documented in the shared record;
- Individual Accommodation Plans for other users of CTN sites will be documented in SharePoint – Local Team.

Implementation and Review

Individual Accommodation Plans will be reviewed with the person on an ongoing basis to ensure effectiveness. Plans will be modified to improve effectiveness or when accommodation needs change.

Non-identifying information about accommodation requests, accommodations provided will be summarized by the Director of Planning and Evaluation to inform the CTN Accommodation Plan.

Compliance

- CTN complies with the requirements under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* as applicable including provision of an online Accessibility Report with the Government of Ontario, regarding compliance with the standards;
- The Completed **Annual Compliance Audit Form** is available via the intranet for employees and volunteers;
- AODA Indicators are reported to the Quality Committee quarterly and to the Board of Directors annually.

Employee Representatives will participate in AODA training and act in accordance with this Policy and Procedure. Employee Representatives will also self-identify any disability-related needs to perform their designated function.

Supervisors/Managers are responsible to ensure all CTN Representatives receive AODA training and act in compliance with this Policy and Procedure. Supervisors/Managers will quickly respond to accommodation requests and take an active role in looking at accommodation solutions that meet the individual's needs.

Senior Management is responsible to ensure policies and procedures are established that comply with the Accessibility for Ontarians with Disabilities Act



	and to make reasonable accommodations when identified and bear the cost of accommodation where required.
References / related documents (LINKS) <i>(internal and external links)</i>	<p>Please note that to successfully complete Mark as Read, you will need to complete the attached questionnaire. Click Mark As Read to access the questionnaire.</p> <p>Accessibility for Ontarians with Disabilities Act, 2005 Accessibility Standards for Customer Service 429/07 <i>Integrated Accessibility Standard 191/11</i> <i>AODA Commitment Statement</i> <i>Annual Compliance Audit Form</i> <i>Complaints Policy and Procedure</i> HR Manual: Employee Formal Complaint HR Manual: Recruitment and Selection Accessibility Planning</p>