STATEMENT of POLICY and PROCEDURE			
Manual:	AODA- Integrated Accessibility Standards Regulations	Policy No.	**AS 2.01A**
Section:	Customer Service	Update Issued:	July 2022
Subject:	**Client and public service policy on providing service to people with disabilities**	Effective:	January 1st, 2012
Issue to:	All manual holders	Page:	1 of 11
		Replaces:	**1st edition-issued Jan. 2012**
Issued by:	Executive Director & Administration	Previously Dated:	Dec. 2011

1 POLICY

1.01 The mission of Bridges Community Health Centre (CHC) is to promote and maintain the health and wellness of all members of our community by:

a) Providing health education to empower individuals and families in the prevention of illness and the promotion of wellness;

b) Providing health maintenance and restoration activities administered by accredited and culturally competent care providers;

c) Undertaking these responsibilities in a dynamic manner that is responsive to the ever-changing needs of our community.

1.02 Our commitment in fulfilling our mission is to always strive to provide our services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way to other clients and participants.

2 PURPOSE

2.01 This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

3 SCOPE

3.01 This policy applies to all employees and all facilities of Bridges Community Health Centre in Ontario.

4 RESPONSIBILITY

4.01 It is the responsibility of the managers and/or immediate supervisors to ensure that all employees follow the guidelines set out in this policy.

4.02 Each manager and/or immediate supervisor is responsible for ensuring all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

"Assistive device": A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that clients bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

"Disability": As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the Ontario *Human Rights Code*, refers to:

- 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 or more 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*.

"Guide dog": A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety, and increased independence for people who are blind.

"Service animal": A service animal for a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:

- 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; or
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

"Support person": In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

6 PROCEDURES

The Provision of Goods and Services to Persons with Disabilities

Bridges Community Health Centre will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality;

- Allowing clients with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a health and safety risk;
- Using alternative methods when possible to ensure that clients with disabilities have access to the same services, in the same place and in a similar manner;
- Considering individual accommodation needs when providing goods and services; and
- Communicating in a manner that considers the client's disability.

The Use of Assistive Devices

Client's Own Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Bridges CHC.

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a client with an oxygen tank might involve ensuring the client is in a location that would be considered safe for both the client and organization.

As another example, where elevators are not present and where a client requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the client.

Assistive Devices Provided by Bridges Community Health Centre

The following assistive devices are available upon request, during a visit to the CHC, to help clients access our goods and services:

- Raised seating platforms;
- Walkers;
- Walking canes; and

- Wheelchairs.

Guide Dogs and Service Animals

A client or visitor with a disability who is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. “No pet” policies do not apply to guide dogs or service animals.

Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person’s disability or purpose of the animal.

Recognizing a Guide Dog or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, Bridges Community Health Centre may request verification from the customer.

Care and Control of the Animal:

The customer who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Bridges Community Health Centre will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company’s obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each customer’s accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person’s health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyze all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two

individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, Bridges Community Health Centre will ensure that both people may enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, the company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer before any potentially confidential information is mentioned.

Notice of Disruptions in Service

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Bridges Community Health Centre. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur, Bridges Community Health Centre will provide notice by:

- Posting notices in conspicuous places, including at the point of disruption, at the main entrance, and the nearest accessible entrance to the service disruption, or on the company website;
- Contacting customers with appointments;
- Verbally notifying customers when they make a reservation or appointment; or
- By any other method that may be reasonable under the circumstances.

Unconvertible Information

If we have resources, we are not able to convert into an accessible format, we will consult with our patient to decide how best to share this information with them. This may include a scheduled appointment, in a timely manner, in person, over the telephone or by visual virtual visit. There will never be a fee imposed on a patient.

Customer Feedback

Bridges Community Health Centre shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available by way of a sign, posted in the waiting room and also on the website under “About Us”. Feedback forms, along with alternate methods of providing feedback verbally

(in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

Submitting Feedback

Customers can submit feedback to:

Program Manager/HR Coordinator

905-871-7621 ext. 2222
1485 Garrison Rd., Fort Erie, ON, L2A 1P8
amy.devereaux@bridgeschc.ca

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Bridges Community Health Centre employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Training

Training will be provided to:

- Every employee of Bridges Community Health Centre;
- Every person who participates in developing the policies of Bridges Community Health Centre; and
- Every other person who provides goods, services, or facilities on behalf of Bridges Community Health Centre.

Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- A review of the requirements of the customer service standards;

- Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who:
    - Use assistive devices;
    - Require the assistance of a guide dog or other service animal; or
    - Require the use of a support person
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

Bridges Community Health Centre will provide training to new employees, during onboarding orientation, within the first two weeks of employment. If a new hire can produce evidence of AODA training within the last 12 months, they will not have to complete the training at this time. Refresher training will be provided to all staff every 2 years. Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

Record of Training

Bridges Community Health Centre will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents to Customers

Bridges Community Health Centre shall notify customers that the documents related to the customer service standards are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Bridges Community Health Centre, the website of Bridges Community Health Centre, and any other reasonable method.

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Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Amy Devereaux,
Program Manager/HR Coordinator

905-871-7621 ext. 2222
1485 Garrison Rd., Fort Erie, ON, L2A 1P8
amy.devereaux@bridgeschc.ca

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to company procedures.

Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the AODA – Integrated Accessibility Standards Regular (IASR) Customer Service Standards Policy of Bridges Community Health Centre. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules set forth by this policy, I may face disciplinary action up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____

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(Note: This policy has been updated to reflect the July 1, 2018, changes to the regulations under Ontario's Health Protection and Promotion Act.)