

WOOLWICH COMMUNITY HEALTH CENTRE

ACCESSIBILITY PLAN

3.2.8 ACCESSIBILITY FOR CLIENTS WITH DISABILITIES¹

Policy Statement

Woolwich Community Health Centre will take all reasonable measures to ensure that all clients have equal access to the services we provide. We will do this by:

- establishing policies, procedures and practices that describe how we serve people with disabilities
- using reasonable effort to ensure our client policies are consistent with the principles of dignity, independence, integration of services and equality of opportunity
- dealing with the use of assistive devices for people with disabilities in our policies
- communicating with people with disabilities in ways that take into account their disabilities
- welcoming people accompanied by guide dogs, service animals or support people and providing information about access
- providing clear, complete, timely and prominent notice of temporary disruption of any of our facilities used by people with disabilities to help them access our services
- providing timely and ongoing training to our staff, students and volunteers who deal with clients, to ensure their understanding of

¹ Based on sample policies from the “ Accessibility Standards for Customer Service Tool kit and resources for the mental health and addictions sector 2009”, as well as the following:

1. Canadian Charter of Rights and Freedoms
2. Human Rights Code of Ontario
3. Accessibility for Ontarians with Disabilities Act, 2005
4. Ontario Regulation 429/07: Accessibility Standards for Customer Service
5. Blind Persons’ Rights Act: Regulation 58 Guide Dogs
6. WCHC’s vision, mission and values, and Anti-Discrimination Policy [3.2.1.1]

and ability to implement our policies regarding service to people with disabilities.

Context

This policy and its sub-policies apply to:

- all clients who access our services
- all staff, volunteers, students, contractors, consultants and others working on behalf of Woolwich Community Health Centre and who provide client services
- people who accompany clients with disabilities who use our services

Definitions of common terms used in this policy and its sub-policies:

- **Assistive Device** – May be devices that people bring with them, such as walkers, magnifiers, or oxygen tanks. Assistive devices that Woolwich Community Health Centre might provide include: assistive software for people with visual, hearing or mobility impairments, wheelchairs, TTY (telephone teletype), or assistance from a staff person.
- **Barrier** – 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, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.
- **Client, Consumer, Customer** – A person who inquires about or accesses the services of Woolwich Community Health Centre or visits our sites.
- **Dignity** – Treating a client with a disability as valued and deserving of the same type of service Woolwich Community Health Centre provides to any other client.

- **Disability** – The definition of “disability” used in the Accessibility for Ontarians with Disabilities Act (AODA) is from the Human Rights Code and means:
 - 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 a 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

The Guide: Accessibility Standards for Customer Service, Ontario Regulation 429/07 states that: “The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.”

- **Equal Opportunity** – People with disabilities having the same chances, options, and benefits as others and their special needs are taken into account to ensure they can fully participate in programs and services.
- **Feedback** – The opportunity for the public to provide feedback on services provided through WCHC can be done through the general client feedback and complaint process (see policy 3.2.7). Notice of the client feedback and complaint process is posted at all

WCHC sites, and will also be provided upon request and communicated in a manner that takes into account the person's disability.

- **Guide Dog** – This is a dog that has successfully completed the training program at any of the facilities listed in the Blind Persons' Rights Act and has been qualified as a guide dog.
- **Independence** – Freedom from control or influence of others, freedom to make choices or do things in a preferred way at a chosen pace.
- **Integration** – Allowing clients who have disabilities to fully benefit from the same programs and services in the same place and in the same or similar ways as other clients. In the context of this policy, integration of services does not mean coordinating services among service providers and jurisdictions.
- **Interpretation** – Interpretation means rendering spoken language into another spoken language, or the process of rendering spoken language into visual language (e.g. American Sign Language). Interpretation includes a variety of alternative methods of communication that meet the needs of the person with a disability.
- **Service** – For the purposes of this policy, service is defined as work or duties performed for the benefit of the client and include providing advice, assistance and instructions in addition to providing programming, consultations and training.
- **Service Animal** – May also be called “assistance animals”, “assist animals”, “support animals” or “helper animals”. 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 or her disability; or the person provides a letter from a physician or nurse confirming the person requires the animal for reasons relating to the disability.
- **Support Person** – May also be called “support professional”, “caregiver”, “interpreter” or “friend” to name a few. A support

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

- **Training** – Every person who deals with a member of the public or participates in developing WCHC’s policies, procedures, and practices governing the provision of services to the public, will receive training and orientation to the Accessibility for Ontarians with Disabilities Act, as well as to WCHC’s policies, procedures, and practices governing the provision of goods and services to persons with disabilities. This training will be provided as soon as practicable after he or she is assigned the applicable duties. The training will also be provided on an ongoing basis in connection with any changes to policies, procedures, and practices.

3.2.8.1 Use of Assistive Devices Policy

Policy Statement

Woolwich Community Health 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 health and safety laws or regulations. We will do this by:

- using reasonable effort to ensure clients, consumers and visitors with disabilities and who use assistive devices are treated with dignity, independence, integration of services and equality of opportunity
- educating staff about personal assistive devices.

Procedures

- We will inform our clients and visitors with disabilities about the personal assistive devices available for their use on our premises (e.g., wheelchairs).
- Striving to expand our inventory of assistive devices when making budgeting and purchasing decisions, as guided by expressed or observed unmet needs of clients with disabilities.
- Providing alternative ways of helping clients and visitors with disabilities to access our premises or services when they are unable to use their own assistive devices, such as:
 - a staff person providing assistance when a personal assistive device cannot be used
 - writing information clearly and simply if electrical equipment causes static in a person's hearing aid
 - asking how best to assist the person.

3.2.8.2 Communicating with People with Disabilities

Policy Statement

Woolwich Community Health Centre is committed to communicating effectively with people with disabilities. We will do this by:

- taking into account 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
- keeping current with communication technology and standards for people with disabilities.

Context

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.

Procedures

- When possible, Woolwich Community Health Centre will provide aids that are used to help people with a disability communicate (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, WCHC will offer alternative formats for communication in order to address the needs of people with disabilities (e.g., large print, Braille, etc.).

3.2.8.3 Guide Dogs and Service Animals

Policy Statement

Woolwich Community Health Centre is committed to allowing full access to our sites to people with disabilities and their service animals wherever possible. We will do 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
- 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
- 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.

Procedures

- WCHC will educate clients and the community, through postings at our sites, in our publications and on our website, that service animals are welcome at our sites wherever possible.
- Alternative ways of providing service will be explored if service animals are not allowed by law in certain areas of the premises.
- Health regulations concerning service animals will be posted in any area where food is prepared and served.

3.2.8.4 Support Persons

Policy Statement

Woolwich Community Health Centre is committed to allowing full access to our sites to people with disabilities and their support persons, unless that area of the health centre premises is not open to the public or other third parties. Support persons accompanying a person with a disability will be required to uphold all of WCHC's requirements with respect to privacy and confidentiality related to personal information and personal health information, as relevant. WCHC staff will orient support persons to these requirements in keeping with the nature of their support to a person with a disability.

Procedures

- When clients access health centre services and programs in the company of their support person, it is understood that the client has provided implied consent to the presence of their support person.
- In keeping with WCHC's policy 8.3.2 Disclosure of Personal Information and Personal Health Information, WCHC staff will ask a client who is accompanied by a support person, for his/her express verbal consent prior to discussing the client's personal

information, or personal health information, in the presence of the support person.

- When clients attend a group program with their support person, and the group program requires participants to keep group discussions confidential (e.g., group therapy, group counseling), the support person will also be required to commit to maintaining confidentiality even though s/he is not a participant per se.
- When clients attend a health centre program for which there is a registration cost (e.g., fitness program), and are accompanied by their support person, the support person will not be charged the registration cost.

3.2.8.5 Notice of Disruptions in Service Procedures

Policy Statement

In the event that there is a disruption in the usual facilities or services that Woolwich Community Health Centre provides to people with disabilities in order for them to access our services (e.g., lifts, accessible washrooms, ramps, automatic doors, 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., inspection of mechanical lifts, repairs to automatic doors), notices of the disruption will be posted in advance.
- When service disruptions are not anticipated (e.g., sudden malfunction in automatic door), notices of service disruption will be posted as soon as the disruption occurs.
- 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 (e.g., moving service provider to main level of site if mechanical lift is out of order, so that client using wheelchair can receive service that would typically be provided in a second-floor treatment room).

3.2.7 CLIENT FEEDBACK AND COMPLAINT PROCEDURE

Policy Statement

Woolwich Community Health Centre affirms the right of clients to express their suggestions, dissatisfaction, complaints and grievances. WCHC will respond to all expressed concerns with a commitment to try and resolve them.

In the case of alleged professional misconduct, the complaint will be dealt with by both WCHC and the practitioner's professional governing body.

Procedures

For all complaints the following will take place (see Appendix 3.2.2 for Client Complaint Procedure Posting):

- The client will be encouraged to try to resolve the issue directly with the staff person involved.

- If the issue cannot be resolved, the client will be asked to put their complaint in writing and send it to one of the health centre management staff:
 - To the Director of Clinical Services, if the issue is related to primary health care services
 - To the Program Coordinator, if the issue is related to group programs or outreach activities
 - To the Executive Director, if the issue is related to organization-wide policy.
- If the client is not comfortable with making a written complaint², they will be encouraged to contact management staff by phone or other means comfortable for the client.
- Management staff will investigate the complaint. Within two working days of receiving the complaint, management staff will contact the client to acknowledge the complaint has been received and establish an agreed-upon timeframe for resolution. Management staff will then follow up in person and/or in writing within a reasonable timeframe.
- If the client complaint is still not resolved to the client's satisfaction, they will be asked to send the complaint in writing to the Chairperson of the WCHC Board of Directors.
- The Board Chairperson will form a Complaint Review Committee to investigate the complaint and prepare a written response. This process may include a meeting with the client and another person they may want for support or consultation. The Complaint Review Committee will include the Chairperson of the WCHC Board, a staff person from WCHC (chosen by the Executive Director), the Executive Director of WCHC, and a person from the community mutually chosen by the client and the Board Chairperson.

² *Clients with disabilities, or who are otherwise unable to or uncomfortable with providing a written complaint, will be encouraged to use any other means that feels appropriate to them, including providing their feedback in person, by telephone, or by delivering an electronic text by email or on diskette.*

