



**Canadian Mental
Health Association**
Hamilton
Mental health for all

**Association canadienne
pour la santé mentale**
Hamilton
La santé mentale pour tous

Accessibility Standards Workplace Policy

Revised July 2023



Canadian Mental
Health Association
Hamilton

ACCESSIBILITY STANDARDS WORKPLACE POLICY

INTRODUCTION

Our Agency

The Canadian Mental Health Association, Hamilton Branch is a non-profit community mental health agency which provides services to adults with serious mental illness. Our Mission statement: Assist and encourage consumers to achieve and maintain their optimum level of functioning in the community within the framework of self-determination. The Hamilton Branch employs over 50 people.

Our Responsibilities

The Canadian Mental Health Association, Hamilton Branch is committed to accessibility as expressed in the *Accessibility for Ontarians with Disabilities Act*, (AODA) which places a legal obligation on organizations to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

The CMHA is committed to providing, when necessary, supports to staff, students, volunteers, Board Members and other users in a way that respects the dignity and independence of people with disabilities. The CMHA strives to ensure that persons with disabilities have equal opportunity to access our services in an integrated manner, and where possible without the need for adaptation, unless alternate measures are necessary.

The Canadian Mental Health Association, Hamilton Branch, is aware that Integrated Accessibility Standards Regulation, Ontario Regulation 191/11 and the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) sets out an employer's responsibility in developing and implementing a procedure to deal with emergency situations for employees with disabilities. In addition, is committed to providing all emergency information in an accessible format conducive to an individual's disability.

A copy of this policy is to be given to all current and future staff, students, volunteers and Board Members as part of the Canadian Mental Health Association, Hamilton Branch orientation process. All persons receiving a copy of this policy will be required to familiarize themselves with the contents and process set out in this policy.

Principles

The purpose of this policy is to provide and maintain a cooperative and professional work environment where all CMHA staff, students, volunteers and Board members have the opportunity to contribute to their maximum potential.

The Canadian Mental Health Association, Hamilton Branch believes that the diversity of our country is a source of social, cultural and economic enrichment and strength and wishes to provide a climate of understanding and mutual respect for the dignity and worth of each individual. As an equity seeking organization, the CMHA seeks to provide for equal rights and opportunities without discrimination.

Scope

This policy applies to all staff, students, volunteers, Board Members, visitors and other users of the services of the CMHA. The CMHA shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with this policy, its principles and commitments. This policy includes work-related activities or events that occur outside of normal business hours or off business premises.

1. Definitions

1.1 Disability: The *AODA* uses the Ontario Human Rights Code definition of disability which is defined as:

- i. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impairment, deafness or hearing impairment, muteness or speech impairment, or physical reliance on a guide dog, or other animal or a wheelchair or other remedial appliance or device;
- ii. a condition of mental impairment or developmental disability;
- iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- iv. a mental disorder; or
- v. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

1.2 Guide dog/Service animal is any guide dog, signal dog, or other animal individually trained to provide assistance to a person with a disability. They perform some of the functions and tasks that the person with a disability cannot perform for themselves. If they meet this definition, animals are considered service animals.

1.3 Support Person: any person who provides assistance to a person with a disability.

2. Assistive Devices

2.1 When a person with a disability requires assistive devices to access programs or services at the CMHA, they are permitted to use such devices. Personal assistive devices are often used by persons with disabilities to help them with daily living. They are usually devices that people bring with them to the CMHA and may consist of any auxiliary aids such as communication aids, cognition aids, personal mobility aids and/or medical aids. When available, the CMHA will provide assistive technology in order to allow people with disabilities to access CMHA programs and services.

2.2 In accordance with the Accessibility for Ontarians with Disabilities Act, people may use their own personal assistive devices while accessing goods and services at the CMHA.

Assistive devices may include but are not limited to:

- Manual and motorized wheelchairs, scooters, canes, crutches, walkers,
- hearing aids and personal TTYs
- magnifiers,
- oxygen tanks,
- computers and adaptive technology.

3. Communication with Persons with a Disability

3.1 When communicating with a person with a disability, the CMHA will do so in a manner that takes into account the person's disability.

3.2 Accessible Information

The CMHA will let the public know that we will make information accessible upon request. We are committed to working with a person with disabilities to figure out how to best meet their needs. The CMHA will take the following steps to make sure that information about our services is accessible.

- Assess our information – Assess how we provide information to the public.
- Make it Accessible Upon Request – Work with people with disabilities to try and meet their needs by recreating it in a different format or by helping use the original document or resource.
- Provide the Information as Soon as Possible – When feasible and organization resources permit, making the information accessible as soon as is possible to the person with the disability.
- Let the Public Know – Telling our clients and public that we will make information accessible upon request. The agency will include a note on the website and promotional materials, and a notice on bulletin boards.

3.3 The CMHA will also create an accessible format to share emergency and safety information to all staff upon request by:

1. Making a Large print format available.
2. Employing Communication Support: Have staff read emergency information aloud to visually impaired staff.
3. Working with the individual to determine what they need.

3.4 All communications with a person with a disability will be in a manner that takes into account the person's disability. If one form or method of communication cannot be used by a person with a disability, they may be able to use another form or method, or a combination. A form of communication could be writing, speaking or the use of pictures. A method of communication could be in person, over the phone or online.

3.5 A directory will be maintained listing staff who speak languages in addition to English.

3.6 A directory of external translator and sign language resources and known cost, if any, will be maintained.

3.7 All CMHA Intake forms will be revised to ask if the person uses assistive devices.

3.8 The CMHA will post their hours of operation and, for after hours, the telephone number for Crisis, in a place visible from outside the main entrance.

3.9 Agency services content on the website is available to be viewed in larger fonts.

3.10 A resource list indicating where to obtain other formats e.g. audio, video, Braille and sign language video will be available to enable an agency response to less frequently required supports.

4. Training

4.1 The CMHA will provide training to all staff, volunteers and any other person who provides goods, services and facilities on behalf of the CMHA.

4.2 The CMHA will keep records of the training provided, including the dates training is provided and the number of persons trained.

4.3 The training will be delivered in a variety of formats and will be provided to new staff, volunteers or others as soon as practicable after the commencement of their duties and

on an ongoing basis for staff, volunteers and others so as to ensure that they remain current and up to date with changes in policies, practices and procedures.

- 4.4** The training will include the following:
 - 4.4.1** How to interact and communicate with persons in a manner that takes into account their disability;
 - 4.4.2** How to interact with persons with disabilities who use assistive devices or require the assistance of a guide dog, service animal or a support person to access goods or services;
 - 4.4.3** How to use equipment or devices available at the CMHA premises or provided by the CMHA that may help with the provision of goods and services;
 - 4.4.4** What to do if a person with a disability is having difficulty accessing the CMHA's programs, goods or services;
 - 4.4.5** Offering alternative formats that are available to address the needs of people with disabilities;
 - 4.4.6** A review of the purposes of the Accessibility for Ontarians with Disabilities Act 2005 and the requirements of the customer service standard; and
 - 4.4.7** Our Accessibility Standards Workplace Policy, practices and procedures governing the provision of goods or services to people with disabilities.

5. Guide Dogs, Service Animals

- 5.1** When a person with a disability is accompanied by a guide dog or other service animal, the CMHA will permit the person to enter the premises with the animal and keep it with him or her, unless is otherwise excluded by law from the premises, these include, but are not limited to, the following:
 - Locations that would be deemed as a health and safety risk
 - Location where the owner/lessor of such locations has a policy or practice governing service animals or support persons contrary to CMHA's Policy
- 5.2** If the service animal is excluded by law from the premises, the CMHA will look to other available measures to enable the person with a disability to obtain, use or benefit from the CMHA's services.
- 5.3** If you cannot easily identify that the animal is a service animal i.e. it does not wear a vest or harness identifying it as a service animal, you can ask the person to provide documentation from a regulated health professional. The documentation must confirm that the person needs the service animal for reasons relating to their disability.
 - 5.3.1** A regulated health professional includes a psychologist, physiotherapists, audiologist, speech pathologist, chiropractor, nurse, occupational therapist, physician, optometrist, registered psychotherapist and registered mental health therapist.
- 5.4** Once an animal has been accepted as a service animal the client's name will be entered on a list readily available to communicate this fact to other staff and volunteers and students to reduce or eliminate the need for asking the client on subsequent visits.
- 5.5** The CMHA reserves the right to limit the entrance of "exotic animals" to its premises on the grounds of health or safety or common fears engendered by some species. In all cases alternate arrangements for meeting will be made.
- 5.6** In the event any of the aforementioned limitations appear necessary to act on, the staff will consult with a Program Director before doing so. Where this will create a significant delay to responding to the client, the staff will proceed using the above noted guidelines and will report the situation to a Program Director as soon after the situation is resolved as is practicable.

5.7 Program sites that are shared with other services or operated by other services e.g. Wayside offices we will recommend and advocate for the same level of access as described for CMHA sites.

6. Support Persons

6.1 In certain cases, you may require a person with a disability to be accompanied by a support person for health or safety reasons. Before making a decision, your organization must:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

In such a situation, you must waive the admission fee or fare for the support person, if one exists.

6.2 When person with a disability is accompanied by a support person, the CMHA will ensure that both parties are permitted to enter the premises together, and that the person with a disability is not prevented from having access to the support person.

6.3 The CMHA may require a person with a disability to be accompanied by a support person when on the CMHA's premises, but only if a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises.

7. Notice of Temporary Disruptions in Service

7.1 The CMHA will provide users with appropriate notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities.

7.2 When there is a disruption in a particular facility or service used to allow a person with a disability to access services, the CMHA will give notice of the disruption to the public by posting the reason for the disruption, the anticipated duration of the disruption, and a description of alternative facilities or services that may be available.

7.3 This posting will be in a conspicuous place on the premises of the CMHA, or by other reasonable methods in the circumstances.

7.4 If the disruption is anticipated, the CMHA will provide a reasonable amount of advance notice of the disruption. If the disruption is unexpected, notice will be provided as soon as possible.

7.5 For equipment repairs or washroom shutdown planned in advance clients with disabilities will be notified in advance where possible via posted notices in conspicuous places at the site, on our website and individually at the time of booking an appointment.

7.6 Responsibility for providing these posted notices will be the supervisor/director responsible for the site or program.

7.7 When the regular schedule for a program service is to be altered, the above in-program notification methods will be utilized in a timely fashion.

7.8 Scheduled clients will be contacted by their worker where possible to inform them of an unexpected disruption that will affect them.

8. Feedback Process

- 8.1** The CMHA will establish a process for people to provide feedback on how to provide goods and services to people with disabilities and how to respond to any feedback and take action on any complaints. The CMHA will make the information about the feedback process readily available to the public.
- 8.2** Comments on how well the CMHA's service delivery meets the expectations of our staff, volunteers, students, Board Members and other users are welcomed and appreciated.
- 8.3** Feedback about the manner in which the CMHA provides goods and services to persons with disabilities can be provided in person, by telephone, in writing, by access via our Website, or otherwise.
- 8.4** All public websites and web content conform with WCAG 2.0 Level AA.
- 8.5** The Operations Coordinator will communicate with the Senior Leadership Team on a regular basis if a new website is being considered and implemented. If it is determined that a new website is being considered, feedback from the Senior Leadership Team will occur to ensure that it contains accessible content for people with disabilities.
- 8.6** All feedback pertaining to the provision of goods and services under this policy shall be directed to the C.E.O./Executive Director of the CMHA, or a designate.
- 8.7** Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve services. In most cases, a response to the feedback will be provided within 15 working days.
- 8.8** Any complaints will be responded to in a timely manner.
- 8.9** We will provide or arrange for your feedback in accessible formats and communication supports, on request.

9. Emergency Response Procedure for Employees with Disabilities

- 9.1** If a person with a known permanent or temporary disability is employed at the Canadian Mental Health Association (CMHA) and may need help in an emergency, the CMHA will instruct their immediate supervisor to:
- Give them individualized emergency response information
 - Develop an individualized emergency response plan for the individual (See CMHA's Emergency Response Procedure for Employees with Disabilities)
 - Get their consent, then share this information with anyone designated to help them in an emergency
 - Review the emergency response information when:
 - the employee changes work locations
 - you review the employee's overall accommodation needs
 - you review your organization's emergency response policies
- 9.2** In addition, in order to determine who needs help, an annual memo will be sent out to elicit employee input.

10. Notice of Availability of Documents

- 10.1** This Policy as well as other documents related to the provision of goods and services for persons with disabilities will be advertised through a variety of methods to ensure the public of their existence.
- 10.2** These documents will be made available on request and in a format that takes into account the person's disability.

The policies defining CMHA's Accessibility Standards are available to anyone upon request. They are posted on our website and made available in alternate formats when the need is identified. If an alternate format is requested we will engage with the client with a disability and seek to agree on an acceptable format that takes into account the person's disability. The time required to provide an alternate format will be determined at the time of request and confirmed with the person requesting the format.

Notice of this policy will be posted on our website.

11. Employment Practices

11.1.1 Hiring: The CMHA will notify employees and the public that we will accommodate the needs of people with disabilities in our hiring process.

11.1.2 During the hiring process, we will tell job applicants when they are selected for an interview that accommodation will be provided.

11.1.3 If an applicant or successful candidate requests an accommodation, we will discuss their needs with them and make adjustments to support them.

11.2. Workplace Information: We will provide workplace information in an accessible format if an employee asks for it. This includes:

- any information employees need to perform their jobs (e.g. job descriptions and manuals)
- general information that is available to all employees at work (e.g. company newsletters, bulletins about company policies and health and safety information)

We will talk to our employees with disabilities about how they need to receive information.

11.3 Performance Management: In order to support people with disabilities the CMHA will:

- Create individual Accommodation Plans for employees with disabilities. Accommodation Plans are a formal way to record and review the things we need to do to accommodate an employee with a disability. These plans will help understand each person's needs and determine whether adjustments need to be made to help them succeed. The plans will be subject to regular reviews and updates.
- The plans will outline the accommodations the agency will provide, how the agency will help the employee stay safe in an emergency, accessible formats and communication support, and how and when review and update of the plan will occur.
- All Accommodation Plans are private information and the agency will protect the privacy of the employees' personal information.
- Make performance management documents, such as performance plans, available in accessible formats, such as large print, when asked.
- Provide feedback and coach employees with disabilities in a way that is accessible to them, such as using plain language.

- Consider accommodation plans with employees with disabilities to help them learn new skills or take on more responsibilities in their current position.
- Assist employees with disabilities succeed in other positions when they change jobs in the agency.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.

11.4 Professional Development Plan: When implementing a Profession Development Plan we will consider the needs of an employee with disabilities when we:

- hold formal or informal performance reviews
- promote or move them to a new job

11.5 Return to Work

- Individual Accommodation Plans will be considered and drafted for employees returning to work with temporary, recurring and permanent disabilities.

12. Design of Public Spaces

The agency will take the following steps to satisfy the requirements of the Accessibility Standard for the Design of Public Spaces.

12.1 Parking: This standard only applies when the agency plans to build new or make changes to agency owned existing parking spaces. Off-street parking is a space where you can park your vehicle temporarily that is not on a public road or street.

- Off-street parking facilities must include two types of accessible parking spaces; wider spaces for people who use mobility aids, such as wheelchairs, and standard-width spaces for people who use mobility assistive devices, such as canes, crutches, and walkers
- Off-street parking facilities must include a minimum number of each type of accessible parking space, depending on the total number of parking spaces
- Accessible parking spaces must have access aisles (a space between parking spaces) that allow people with disabilities to get in and out of their vehicles

12.2 Service Counters and Waiting Areas: This standard only applies when the agency plans to build new or make changes to existing features.

- At least one service counter has to be accessible to people who use mobility aids, such as wheelchairs. This may include being low enough for someone sitting in a mobility aid and/or has enough clear space in front for a person in a mobility aid to approach the counter, including space for the person’s knees. The accessible service counter has to be clearly identified with signage.

12.3 Kiosks: “Kiosk” is defined as an interactive electronic terminal intended for public use that allows users to access one or more service or products or both. We will incorporate accessibility

features/consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks. Some examples include but are not limited to:

- Consideration will be given to the colour contrast on the display screen
- Extra time for people to complete tasks
- Staff assistance to complete tasks
- Consideration will be made regarding the location, height, and stability of the public kiosk
- Headset jacks with volume control
- Voice commands
- Touch screen

13. Modifications to this policy

The CMHA is committed to developing service policies that respect and promote the dignity and independence of people with disabilities. The CMHA develops and updates policies, procedures and practices in such a manner as to respect and promote the dignity and independence of people with disabilities, as well as integration and equality of opportunity.

This document is available in alternative format upon request.