

Policy and Procedure

Subject: Accessibility (AODA)	
Section: Facilities and administration	
Issued by: Human Resources	Approval date: January 1, 2012
Approved by: Senior Management	Effective date: January 1, 2012
Revision date: June 29, 2021	

1. Purpose:

To ensure Bellwood Health Services Inc meets or exceeds its requirements as defined under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Ontarians with Disabilities Act, 2001 (ODA), including but not limited to, the Accessibility Standards for Customer Service, Ontario Regulation 429/07 and the Integrated Accessibility Standards, Ontario Regulation 191/11.

2. Policy:

Bellwood Health Services Inc is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who enter the premises, work for the company, access information provided by the company, or use the company's goods and services.

Bellwood Health Services Inc will work to break down the barriers that prevent or limit persons with disabilities from employment, receipt of goods and services, the built environment, and information and communication through the implementation of accessibility standards.

3. Definitions:

Accessible formats: Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Assistive device: A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities.

Barrier: anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communication barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Communication supports: Captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

Conversion-ready: An electronic or digital format that facilitates conversion into an acceptable format.

Disability: The temporary, prolonged, or permanent reduction or absence of the ability to perform certain commonplace activities or roles sometimes referred to as activities of daily living.

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Guide dog: A guide dog as defined in section 1 of the Blind Persons' Rights Act.

Service animal: An animal described in section 4, subsection (9) of the AODA 2005; and if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; and/or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support person: A support person is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs, or access to goods or services. The support person could be a paid personal support worker, a volunteer, a friend or family member. He or she does not necessarily need to have special training or qualifications.

4. Guideline:**Employment**

Bellwood Health Services Inc will make every effort to identify, remove, and prevent barriers by developing inclusive employment procedures that support persons with disabilities with accommodations during the recruitment and selection stages, and throughout the employment life cycle.

Recruitment and Hiring

Bellwood Health Services Inc understands that improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can expand the pool of talented candidates. Upon request, the company will provide candidates with reasonable accommodations during the interview and selection process. Where an accommodation is requested, the company will consult with the applicant to arrange suitable accommodations, such as providing the application in an alternate or accessible format.

The company interview process will focus on experience and skills and will not discriminate against candidates who have a disability or require an accommodation. Bellwood Health Services Inc is committed to hiring decisions that are unbiased and based on qualifications and past experience. Successful candidates will be made aware of policies and supports for accommodations upon completion of the recruitment process.

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Bellwood Health Services Inc recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for individuals with disabilities. The company will align training and development programs to meet the needs of employees with disabilities and provide training as soon as reasonably practicable upon the person being assigned to applicable duties. Training programs will be designed with flexibility to allow customization for the individual requirements of the employee, such as providing training materials in accessible or conversion-ready formats that take into account the need of the employee. The company will consider employee barriers when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.

Communication

Bellwood Health Services Inc will provide or arrange for accessible formats and communication supports for employees, upon request. The company will consult with the employee to determine the specific barrier and the best way to provide support. Such accessible formats and communication supports are conversion-ready and will be provided in a timely manner and at no additional cost to employees.

When communicating with or providing information to an employee who requires accommodation or assistance due to a disability, the company will ensure that all communication with the individual is completed in a manner that takes into account the individual's disability. Where an assistive device is used, the company will reasonably accommodate the use of the device.

Emergency Response

If the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee. If an employee with a disability requires assistance from a support person during an emergency, the company will designate a fellow employee to act as such.

Customized emergency response plans will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs, or plans are reviewed; or
- The company reviews general emergency response policies.

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The duty to accommodate is required of all employers, in all jurisdictions in Canada, and encompasses providing respect and dignity, individualized accommodation, integration and participation, and barrier-free designs. Bellwood Health Services Inc will provide individual accommodations to support the needs of employees with disabilities. Personalized accommodation plans will be designed to allow employees to contribute and participate in job related functions and activities to the best of their abilities. The process of accommodating individuals will take a consultative approach and is a shared obligation of the company, the employee, and any applicable professionals required to assist the employee throughout the process.

Return to Work

Bellwood Health Services Inc is committed to a supportive return-to-work program and will develop and implement return-to-work processes for employees who are absent from work due to a disability and require accommodations in order to return to work. The company will work with the employee to develop an individualized return-to-work plan and support the employee in the transition period by addressing any barriers. The return-to-work process will outline the steps the company will take to facilitate the employee's return to work and use documented individual accommodation plans.

Redeployment

If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, Bellwood Health Services Inc will consider redeployment by placing the employee in an alternative position. Bellwood Health Services Inc will work with human resources, union representatives if applicable, and the employee to determine whether there is another available position. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

Inability to Accommodate

Bellwood Health Services Inc will provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would create a health and safety hazard or cause unreasonable costs for the organization.

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Where a necessary accommodation is found to cause undue hardship on the organization, the company will work to find a fair and equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.

Customer ServiceAccess to Goods and Services

Bellwood Health Services Inc will seek to provide barrier-free access to the company's goods and services for all customers. Where barriers cannot be removed, alternate means for accessing goods or services will be provided to the best of the company's ability.

Support Persons and Service Animals

If a customer with a disability is accompanied by a support person, Bellwood Health Services Inc will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person. A customer with a disability accompanied by a service animal will be allowed access to premises that are open to the public unless otherwise excluded by law.

The company will waive admission fees to support persons, or when not possible, ensure the support person is notified of admission costs in advance. The company will attempt to accommodate the customer and support person to sit with one another. In situations where confidential information might be discussed, consent will be obtained from the customer before any potentially confidential information is mentioned in front of the support person.

Communication

Bellwood Health Services Inc understands the importance of accessible digital and non-digital forms of communication and will do its best to provide accessible types of communication and information to all individuals with disabilities. Such accessible formats and communication supports will be provided upon request, in a timely manner and at no additional cost.

Service Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Bellwood Health Services Inc. 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.

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When disruptions occur, the company will:

- Post notices in the nearest accessible entrance to the service disruption;
- Update the company website with information about the disruption;
- Contact customers with reservations or appointments; or
- By any other method that may be reasonable under the circumstances.

The company will make every reasonable effort to indicate when services will resume and suggest alternatives that can be utilized during the disruption. In some circumstances, such as in the situation of unplanned temporary disruptions or emergencies, advance notice may not be possible.

Emergency Notifications

Bellwood Health Services Inc will provide emergency and public safety information, plans and procedures, maps and warning signs at evacuation points, and any other emergency alert information, in accessible formats or with appropriate communication supports, upon request.

The company will:

- Work any individuals requesting information and to see how to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and
- If a person with a disability requires assistance from a support person in case of an emergency, make sure an employee is available to act as such.

Customer Feedback

Customer feedback can lead to improved service, increased clientele, and a reduction in complaints. Bellwood Health Services Inc will ensure that feedback can be provided by customers with disabilities through a variety of mechanisms, such as in person, by phone, e-mail, text message, or social media. 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.

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

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Bellwood Health Services Inc will work to ensure that the built environment, including building interior and exterior, are designed to facilitate barrier-free access to goods or services for customers and employees. If areas of the built environment are not accessible for certain individuals with disabilities, the company will work with the individual to provide an alternate means of access.

5. References:

Ontarians with Disabilities Act, 2001 (ODA)

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

The Accessibility Standards for Customer Service, Ontario Regulation 429/07

The Integrated Accessibility Standards, Ontario Regulation 191/11

The Ontario Human Rights Code