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# **ACCESSIBLE CUSTOMER SERVICE POLICY**

**AND**

# **INTEGRATED ACCESSIBILITY STANDARDS POLICY**

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Dated the 11<sup>TH</sup> day of May, 2021

Date of Approval: May 11<sup>th</sup>, 2021

# **PART I: ACCESSIBLE CUSTOMER SERVICE POLICY FOR THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF THE DIOCESE OF HAMILTON IN ONTARIO**

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## 1.01 PROVIDING SERVICES TO PEOPLE WITH DISABILITIES

**THE ROMAN CATHOLIC EPISCOPAL CORPORATION of the DIOCESE of HAMILTON in ONTARIO** (hereinafter the “Diocese”) is committed to excellence in serving all of our parishioners and guests, including people with disabilities as important members of our family of faith.

## 1.02 PURPOSE

The purpose of this Accessible Customer Service Policy is to fulfill the requirements set out in Part IV.2 of Regulation 191/11 (formerly Regulation 429/07) of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and to establish a policy for the Diocese that governs the provision of its services to persons with disabilities.

## 1.03 POLICY OVERVIEW

These policies and procedures apply to all services that are provided by the Diocese in the Province of Ontario, by any means including, but not limited to, services in person, by telephone, electronically, by mail, visually, orally or by written means.

## 1.04 SCOPE

The policy applies to the Diocese, its staff, volunteers and any authorized representatives who provides services and/or who deal with the public, on behalf of the Diocese in the Province of Ontario.

## 1.05 DEFINITIONS

For the purposes of this Policy and the Integrated Accessibility Standards Policy (Part II of this document), the terms below are defined as follows:

“**Accessible formats**” may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.

“**Accommodation**” means the arrangements made, or assistance provided, so that persons with disabilities can participate in the experience available to persons without disabilities, subject to reasonable limits prescribed by the Ontario *Human Rights Code*.

**“Communications supports”** may include, but are not limited to, captioning, alternative and augmenting communication supports, plain language, sign language, and any other supports that facilitate effective communications.

**“Assistive Devices”** means devices used by persons with disabilities in order to allow equal opportunity and access to particular activities or services, as well as devices required for the maintenance of a person’s health and well-being, including but not limited to walkers, wheelchairs, white canes, note-taking devices and personal oxygen tanks to assist breathing.

**“Disability”** means,

- 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,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

**“Service Animal”** means an animal that is required by a person with a disability, for reasons relating to the disability.

**“Undue Hardship”** means the point at which the challenges to accommodate a person with a disability become so great that they are prohibitive. The Ontario *Human Rights Code* provides that whether individual has been accommodated to the point of undue hardship is determined by considering cost, outside sources of funding and health and safety requirements.

## 1.06 POLICY

The Diocese is committed to delivering all of its services in a manner that respects the dignity, individuality and independence of persons with disabilities. The Diocese undertakes to ensure that individuals with disabilities are given equal access to opportunities to obtain, use and benefit from its services. As much as possible, such services will be integrated with the services that the Diocese delivers to all of its parishioners and guests, unless alternative measures are necessary. As such, the Diocese shall meet its duties and responsibilities under the AODA by adhering to the following principles and practices:

**a) Assistive devices**

The Diocese recognizes that persons with disabilities may require the use of assistive devices. As such, the Diocese will take all reasonable measures to ensure that its premises are conducive to the use of such devices. Diocesan staff will make all necessary accommodations, up to the point of undue hardship on the Diocese, to enable parishioners and guests to use assistive devices as required to access its services. Further, Diocesan staff will be trained and familiar with various assistive devices that may be used by parishioners or guests with disabilities while accessing its services.

**b) Communication**

The Diocese recognizes that persons with disabilities may have special requirements in terms of communications. The Diocese undertakes to communicate with persons with disabilities in ways that take into account their disability.

**c) Service Animals**

The Diocese allows service animals on the parts of its premises that are open to the public and in all situations where a person with a disability requires the service animal to access the Diocese's services. The Diocese will also be sensitive to any accommodations that may be necessary as a result of the use of a service animal.

When Diocese staff cannot easily identify that an animal is a service animal, staff may ask a person to provide documentation (letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following Colleges:

- 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
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

**d) Support persons**

The Diocese is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter any of the Diocese's premises with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on the Diocese's premises.

**e) Notice of temporary disruption**

The Diocese will give notice of temporary disruptions to services or facilities used by persons with disabilities in order to obtain, use or benefit from its services. Such notice will include the reason(s) for the disruption, the anticipated duration of the disruption and a description of alternative facilities, if any, that will be available during the disruption. The notice shall be posted at a conspicuous place at the office and on the Diocese's website when appropriate. When the disruption is planned, advanced notice will be provided. Where the disruption is anticipated to affect individuals with visual or written comprehension impairments, steps will be taken to notify these individuals in a manner appropriate to their needs.

**f) AODA Training**

The Diocese will provide training to employees and direct service volunteers who deal with the public or other third parties on its behalf and all those who are involved in the development of customer service policies, practices and procedures. Such training will be provided to each person as soon as practicable after he or she is assigned the applicable duties, and on an ongoing basis in connection with any changes in the law, policy, practices and procedures related to the provision of services to persons with disabilities.

The Diocese will ensure that the format for AODA training is accessible and available in multiple formats, including, but not limited to online training modules, and other formats as may be required. The Diocese will keep records of such AODA training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

AODA training in relation to the Accessible Customer Service Policy includes:

- Viewing of ACCESS FORWARD online training modules for Accessible Customer Service Training, or other training resources as necessary;
- Instruction on the Diocese's Policy related to the Customer Service Standard;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use any accessibility equipment located on the Diocese's premises;

- What to do if a person with a disability is having difficulty in accessing the Diocese's services; and
- Additional training as may be necessary on a continuing basis.

**g) Feedback process**

Persons who wish to provide feedback on the way the Diocese provides services to people with disabilities can direct feedback to the office mail, by phone at 1-905-528-7988 or by email at [jlong@hamiltondiocese.com](mailto:jlong@hamiltondiocese.com). Persons can expect to receive a response within seven (7) business days.

**h) Availability of this Policy**

This policy and the Integrated Accessibility Standards Policy (Part II of this document) are available on the Diocese's website: [www.hamiltondiocese.com](http://www.hamiltondiocese.com). If a person with a disability requests a copy of this policy, the Diocese will deliver the policy in a format that takes into account the person's disability.

**i) Modifications to this or other policies**

Any Diocese policy that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

## **PART II: INTEGRATED ACCESSIBILITY STANDARDS POLICY OF THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF THE DIOCESE OF HAMILTON IN ONTARIO**

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### **2.01 STATEMENT OF COMMITMENT**

The Diocese strives to ensure an accessible environment for all persons with disabilities, and will continue to build upon and improve its practices, in addition to ensuring that it meets the accessibility needs of persons with disabilities in a timely manner, consistent with the specific requirements of the AODA and its regulations.

This policy will be implemented in accordance with the time frames established by the *Integrated Accessibility Standards Regulation (IASR)*, O. Reg. 191/11.

### **2.02 ACCESSIBILITY PLAN**

The Diocese will develop, maintain, and document an Accessibility Plan outlining the Diocese's strategy to prevent and remove barriers and to meet its requirements under the IASR.

The Accessibility Plan will be reviewed and updated at least once every five years. Upon request, the Diocese will provide a copy of the Accessibility Plan in an accessible format.

### **2.03 TRAINING STAFF**

The Diocese will ensure that it provides the appropriate training on the requirements of the accessibility standards referred to in the IASR and will provide training on the *Human Rights Code* as it pertains to persons with disabilities to:

- All its employees and direct service volunteers;
- All persons who participate in developing the Diocese's policies; and,
- All other persons who provide goods, services or facilities on behalf of the Diocese in Ontario.

The training will be appropriate to the duties of the employees and other persons referred to above and will include:

- Viewing of ACCESS FORWARD online training modules pertaining to the IASR;
- Viewing of "Working Together: The Code and the AODA" online training modules, prepared by the Ontario Human Rights Commission; and
- Additional training as may be necessary on a continuing basis.

Staff will be trained when changes are made to this Policy. New staff will be trained upon commencement of employment.

The Diocese will keep a record of the training it provides.

## 2.04 INFORMATION AND COMMUNICATIONS STANDARDS

### a) **Feedback**

The Diocese will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports upon request.

### b) **Accessible Formats and Communications Supports**

Upon request, the Diocese will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to a disability.

The Diocese will consult with the person making the request when determining the suitability of an accessible format or communication support.

The Diocese will also notify as necessary the members of public who may contact it about the availability of accessible formats and communication supports.

### c) **Accessible Websites and Web Content**

The Diocese shall make its internet website and web content conform with the World Wide Web Consortium Web Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA in accordance with the IASR.

## 2.05 EMPLOYMENT STANDARDS

### a) **Recruitment**

The Diocese will notify its employees, and the public, about the availability of accommodation for applicants with disabilities in its recruitment process.

### b) **Recruitment, Assessment or Selection Process**

The Diocese will notify job applicants, when individually selected for further participation in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.



If a selected applicant requests an accommodation, the Diocese will consult with the applicant and provide, or arrange for the provision of, a suitable reasonable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability.

**c) Notice to Successful Applicants**

When making offers of employment, the Diocese will notify the successful applicant of its policies for accommodating employees with disabilities.

**d) Informing Employees of Supports**

The Diocese will inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This information will be provided to new employees as soon as practicable after commencing employment.

**e) Accessible Formats and Communication Supports for Employees**

Upon request from an employee with a disability, the Diocese will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the Diocese will consult with the employee making the request.

**f) Workplace Emergency Response Information**

If the Diocese is aware of the need for accommodation due to an employee's disability, the Diocese will provide individualized workplace emergency response information if the disability is such that the individualized information is necessary. The Diocese will provide this information as soon as practicable upon becoming aware of the need for accommodation.

Where the employee requires assistance, the Diocese will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Diocese to provide assistance to the employee.

The Diocese will review the individualized workplace emergency response information when the employee moves to a different location in the Diocese, when the employee's overall accommodation needs or plans are reviewed, and when the Diocese reviews its general emergency response policies.

**g) Documented Individual Accommodation Plans**

The Diocese shall put in place a written process for developing individual accommodation plans for employees with disabilities.

If requested from an employee with a disability, information regarding provided accessible formats and communication supports will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

**h) Return to Work Process**

The Diocese will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The Diocese will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps that the Diocese will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other applicable return to work process created by or under any other statute (i.e., the *Workplace Safety and Insurance Act, 1997*).

**i) Performance Management, Career Development and Advancement & Redeployment**

The Diocese will continue to take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement, or when redeploying employees.

**2.06 Design of Public Spaces Standards (Accessibility Standards for the Built Environment)**

The Diocese will be committed to designing public spaces which it owns in the Province of Ontario that are free from barriers and accessible to all persons it serves in accordance with these standards. The Diocese will comply with the applicable standards with respect to public spaces that are newly constructed or redeveloped, including:

- Outdoor public use eating areas

- Outdoor play spaces
- Exterior paths of travel
- Accessible parking
- Service related elements, such as service counters and waiting areas.