

Accessibility Plan

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Lutherwood's Vision

A community where all children, youth, adults and families experience mental wellness, financial stability and a safe place to live.

Lutherwood's Statement of Commitment to Accessibility

Lutherwood is committed to providing a barrier-free environment for our clients, students, employees, job applicants, suppliers, visitors, and other stakeholders who enter our premises, access our information, or use our services. As an organization Lutherwood respects and upholds the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and the Integrated Accessibility Standards Regulation for Information and Communications, Employment and eventually, for the Built Environment.

Approximately 1.8 million Ontarians live with a disability, and as the population grows older, this number will also increase. Lutherwood has made a commitment to accessibility for everyone who uses our services. Lutherwood has an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance with accessibility legislation by incorporating policies, procedures, equipment requirements, training for employees, and best practices. We will review these policies and practices on a regular basis. Lutherwood's commitment to making our organization accessible to everyone includes the integration of accessibility legislation with our policies, procedures, programs, and training. We are committed to reviewing and incorporating the following information with our employees:

- Legislation regarding the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005.
- Integrated Accessibility Standards for Information and Communications, Employment, and Transportation.
- Accessible employment practices such as recruitment, assessment, and selection.
- Developing emergency response plans and individual workplace accommodation plans for employees with disabilities.
- Customer service standards.
- Accessible communication supports and information formats
- Communicating with people with various forms of disabilities.
- Accessible websites and web content.
- Assistive devices, service animals and support persons.
- Notices of service disruptions
- Lutherwood's relevant policies and procedures regarding accessibility.
- Reporting procedures.
- Training procedures.

Lutherwood realizes that providing accessible and barrier-free environments for everyone is a shared effort. As a community, all businesses and services must work together to make accessibility happen. For more detailed information on our accessibility policies, plans, and training programs, please contact the Human Resources Department.



Accessible Emergency Information

Lutherwood is committed to providing our customers and clients with publicly available emergency information in an accessible way, upon request. We will also develop emergency response plans and individual workplace accommodation plans for employees with disabilities, when necessary.

Training

Lutherwood will provide training to all board members, employees, volunteers and students who work with the public or other third parties that act on behalf of Lutherwood, or whom have a role in the development and approval of customer service policies, practices and procedures.

Training regarding accessible customer service and the *Integrated Accessibility Standards Regulation* will include the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- o Accessibility standard requirements and the Ontario Human Rights Code.
- o Instructions on how to interact and communicate with people with various types of disabilities.
- o Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- o Instructions on how to use equipment or devices that are available at Lutherwood sites or that we provide that may help people with disabilities.
- o Notices of service disruptions.
- o Lutherwood's relevant policies and procedures regarding accessibility.
- o Instructions on what to do if a person with a disability is having difficulty accessing Lutherwood services.
- Identifying and removing barriers in the workplace.
- Agency policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.



Information and Communications

Lutherwood is committed to meeting the communication needs of people with disabilities. We will consult with the individual making the request to assess the suitability of the accessible format or communication support.

Website and Web Content

Lutherwood will achieve compliance with Web Content Accessibility Guidelines (WCAG) 2.0, Level A and Level AA to ensure that websites and web content are accessible to people with disabilities.

Feedback Process

Lutherwood will provide customers with the opportunity to provide feedback regarding 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 the Program Manager or designate. Feedback forms along with alternate methods of providing feedback can be provided through:

Telephone: 519-884-1470
Fax: 519-886-8479
Mail: Alison Kulchecki
Lutherwood

285 Benjamin Road Waterloo ON N2J 3Z4

Email: <u>akulchecki@lutherwood.ca</u>

Notice of Availability and Format of Documents

Lutherwood will notify customers that the documents related to the accessibility will be made available upon request and in a format that takes into account the customer's disability. Notification of these documents will be given by posting the information in a conspicuous place at Lutherwood locations and website, as well as other reasonable methods as necessary.



Employment

Recruitment

Lutherwood is committed to accessible employment practices such as recruitment, assessment, and selection. Lutherwood is committed to ensuring the hiring practice is accessible to all candidates with disabilities. Lutherwood has taken the following steps to accommodate people with disabilities during the recruitment, assessment and selection process:

- All internal and external job postings will notify employees and the public about the availability of accommodation for job applicants who have disabilities.
- Applicants will be informed that these accommodations are available upon request, for the interview process and other candidate selection methods.
- As a part of the on boarding process, new employees will be notified of Lutherwood's policies and supports for accommodating people with disabilities.

Performance Management, Career Development and Redeployment

Lutherwood will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Ongoing review and revision of current return to work policies and procedures to take into account employees with disabilities.
- Review and revision of current documented processes for developing individual accommodation plans for employees with disabilities.
- If requested, individual accommodation plans will include any information regarding accessible formats and communication supports provided, individualized emergency response information, and any other accommodation that is to be provided.

Lutherwood will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account through Lutherwood's performance management, career development and redeployment processes:

- Review and revise policies and processes for performance management, career development
 and redeployment, taking into account the accessibility needs of employees with disabilities as
 well as individual accommodation plans.
- Review an employee's individual accommodation plan to understand the employee's accommodation needs and determine whether it needs adjusting.



Built Environment

Lutherwood is committed to identifying, preventing and removing physical barriers in accessibility in all Lutherwood facilities.

Lutherwood will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.

Disruption of Service

In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access Lutherwood's 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.

- In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:
 - o Services that are disrupted or unavailable.
 - o Reason for the disruption.
 - Anticipated duration.
 - A description of alternative services or options (e.g. meeting at another accessible Lutherwood site).
- When disruptions occur, the affected site will provide notice by:
 - posting notices in conspicuous places including at the point of disruption (e.g. elevator door), at the main entrance and the nearest accessible entrance to the service disruption and/or on the Lutherwood website;
 - o contacting customers with appointments;
 - o verbally notifying customers when they are making an appointment; or
 - o by any other method that may be reasonable under the circumstances that are suitable based on the customer's disability.



For More Information

Lutherwood's Multi-Year Accessibility Plan will be reviewed and updated at least once every five years. For more information on this accessibility plan, please contact Lutherwood's Human Resources department at:

Telephone: 519-884-1470 Fax: 519-884-1042

Mail: Andre Dunn, Manager, Human Resources

Lutherwood

141 Father David Bauer Drive

Waterloo ON N2L 6N9

Email: <u>adunn@lutherwood.ca</u>

Lutherwood's Multi-Year Accessibly Plan will be posted on the Lutherwood website (http://www.lutherwood.ca/agency/about/accessibility) and is available in alternate formats, upon request.



Accessible Customer Service Policy

Date Policy Issued
Date Policy Revised/Reviewed
Date Policy to be Reviewed

Applies to

December 2011 November 2015 October 2019

All Staff Students Volunteers Contractors Board Members

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

<u>PURPOSE:</u> In accordance with the Customer Service Standards, this policy addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices
- The Use of Guide Dogs, Service Animals and Service Dogs
- The Use of Support Persons
- Notice of Service Disruptions
- Customer Feedback
- Training
- Notice of Availability and Format of Required Documents

POLICY:

- 1. To ensure the requirements of the Customer Service Standards included in the Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005*, are being upheld by Lutherwood.
- 2. Disability as defined by the *Accessibility for Ontarians with Disabilities Act*, 2005, and the *Ontario Human Rights Code*, refers to:
 - 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 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*.

PROCEDURE:

The Provision of Goods and Services to Persons with Disabilities:

- 3. Lutherwood will make every reasonable effort to ensure that our policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:
 - a. ensuring that all customers receive the same value and quality of services;
 - b. allowing customers with disabilities to do things in their own ways and at their own pace when accessing services as long as this does not present a safety risk;
 - c. using alternative methods of service delivery when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
 - d. taking into account individual needs when providing services; and;
 - e. communicating in a manner that takes into account the customer's disability.

Assistive Devices:

- 4. An assistive device is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Types of assistive devices include, but are not limited to wheelchairs, walkers, a personal oxygen tank, or speech generating devices that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.
- 5. Each Lutherwood site has a variety of assistive devices available to persons with disabilities. Employees will be oriented as to the proper use of assistive devices through the orientation program.
- 6. Staff must ensure they are aware of the assistive devices that their location has available to customers with disabilities, and that they are trained on how to properly use the devices.
- 7. Persons with disabilities may use their own assistive devices as required when accessing services.
- 8. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services, such as offering the service at a different Lutherwood site that meets the needs of the customer.

Service Animals:

- 9. Service animals are used by people with many different kinds of disabilities. This may include, but not be limited to, persons who are blind, hard of hearing, or experience seizures.
- 10. An animal is a service animal for a person with a disability if:
 - a. 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;
 - b. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to disability:



- i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario:
- ii. A member of the College of Chiropractors of Ontario;
- iii. A member of the College of Nurses of Ontario;
- iv. A member of the College of Occupational Therapists of Ontario;
- v. A member of the College of Optometrists of Ontario;
- vi. A member of the College of Physicians and Surgeons of Ontario;
- vii. A member of the College of Physiotherapists of Ontario;
- viii. A member of the College of Psychologists of Ontario; or
- ix. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.
- 11. If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Lutherwood may request verification from the customer.
- 12. A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to Lutherwood premises that are open to the public unless otherwise excluded by law. If excluded by law, Lutherwood will offer alternative methods to enable the person with a disability to access goods and services when possible.
- 13. The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time, however water must be provided to the animal upon request by the customer.

Support Persons:

- 14. Persons will disabilities may be accompanied by a support person to access services. A support person is someone hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical care, or with access to goods or services. A support person may be a personal care worker, volunteer, friend or family member.
- 15. Where confidentiality is important due to the nature of the service being provided, the support person may be asked to sign a confidentiality agreement.
- 16. Where Lutherwood requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, Lutherwood will not charge the support persons any fees or fares.

Disruption of Service:

- 17. Service disruptions may occur due to a variety of reasons. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access Lutherwood's 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.
- 18. In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:
 - a. services that are disrupted or unavailable
 - b. reason for the disruption
 - c. anticipated duration
 - d. a description of alternative services or options (ie. meeting at another accessible Lutherwood site).
- 19. When disruptions occur the affected site will provide notice by:
 - a. posting notices in conspicuous places including at the point of disruption (ie.
 Elevator door), at the main entrance and the nearest accessible entrance to the service disruption and/or on the Lutherwood website;
 - b. contacting customers with appointments:
 - c. verbally notifying customers when they are making an appointment; or



d. by any other method that may be reasonable under the circumstances.

Feedback Process:

- 20. Lutherwood will provide customers with the opportunity to provide feedback regarding 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 the Program Manager or designate. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.
- 21. Customers can submit feedback directly to the staff member providing the service, or the Program Manager.
- 22. Customers that provide formal feedback will receive acknowledgement of their feedback from the staff member providing the service or the Program Manager or designate, along with any resulting actions based on concerns or complaints that were submitted.
- 23. Staff members are encouraged to review the customer feedback policy and practice that is specific to their team/department.

Training:

- 24. Training regarding accessible customer service will include the following:
 - a. A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
 - b. A review of the requirements of the Customer Service Standards.
 - c. Instructions on how to interact and communicate with people with various types of disabilities.
 - d. Instructions on how to interact with people with disabilities who:
 - i. use assistive devices;
 - ii. require the assistance of a guide dog, service dog or other service animal; or
 - iii. require the use of a support person (including the handling of admission fees).
 - e. Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
 - f. Instructions on what to do if a person with a disability is having difficulty accessing your services.
 - g. Lutherwood's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.
- 25. Training will be provided to all board members, employees, volunteers and students, or other third parties that act on behalf of Lutherwood, or whom have a role in the development and approval of customer service policies, practices and procedures.
- 26. Training will be provided through an online training program.
- 27. After completing the training, employees, volunteers and students will receive a certificate of completion that will be kept in their personnel file.
- 28. Contractors providing services to Lutherwood customers on behalf of Lutherwood must provide documentation demonstrating that their staff have received training regarding accessible customer service related to the AODA. Where this documentation cannot be provided, contractors will be provided with Lutherwood's Accessible Customer Service handbook. The Program Manager or designate who is responsible for coordinating the services of a contractor will be responsible to obtaining this information.

Notice of Availability and Format of Documents:



29. Lutherwood will notify customers that the documents related to the Customer Service Standards will be made available upon request and in a format that takes into account the customer's disability. Notification of these documents will be given by posting the information in a conspicuous place at Lutherwood locations and website, as well as other reasonable methods as necessary.

*Please note that each program area/location may have specific practices, policies and procedures related to the information above. Please reference the following policies in Lutherwood's policy and procedure manual or the department operational manuals for more specific information:

Related Information:

Policy B 6.0 Customer Satisfaction Standardized Measurement
Policy B 5.0 Statement of Commitment to Accessibility
Mental Health Services Policy 353 Serving Customers with Disabilities
Employment Services Policy 2.7 Accessibility Policy
Luther Village on the Park Policy 2.14 Accessible Customer Service Policy



Multi-Year Accessibility Work Plan

Accessibility Requirement	Current Policies	Action	Due Date	Results
Customer Service				
 Establishment of accessibility policies: Instructions on how to interact and communicate with customers 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, service animal or service dog; or require the use of a support person; Instructions on how to use equipment or devices that are available at your premises or that may assist customers with disabilities; Instructions on what to do if a customer with a disability is having difficulty accessing your services; Policies, procedures and practices surrounding the legislation. 	B 5.1 Accessible Customer Service ES 2.7 Accessible Customer Service MHS 353 Serving Customers with Disabilities	All staff, students and volunteers completed training related to the requirements of the Customer Service standard of AODA.	January 1, 2013.	Met compliance requirement and report completed.
 All employees and volunteers; All other persons who provide goods, services or facilities on behalf of the organization; and All persons who participate in developing the organization's policies. Provision of goods and services to persons with disabilities; The use of assistive devices; The use of guide dogs, service animals and service dogs; The use of support persons; Notice of service disruptions; Customer feedback; Training; Notice of availability and format of documents. 	Documented in B 5.1 Accessible Customer Service	Agency Customer Service training provided to all staff, students and volunteers addresses all required information.	January 1, 2013	Met compliance.



Feedback Process		Feedback process	January 1,	Met
 Receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request Notification to the public about the availability of accessible formats and communication supports is required. 		documented in training, accessibility policies, and on the Lutherwood website.	2013	compliance.
Accessible Formats and Communication Support Upon request, provide or arrange to provide accessible formats and communication supports for persons with disabilities: In a timely manner that takes into account the person's accessibility needs; At a cost that is no more that the regular cost charged to other persons.	B 5.1 Accessible Customer Service	Lutherwood will consult with the person making the request to determine the suitability of an accessible format or communication support.	January 1, 2015	Met compliance.
Accessibility Plans Establish, implement, maintain and document a multi-year accessibility plan	Multi-year accessibility plan documented on the Lutherwood website.	Developed and will be updated on an ongoing basis. Provided in accessible formats upon request.	January 1, 2014	Posted on Lutherwood website.
Information & Communication				
 Accessibility for Ontarians with Disabilities Act, 2005; Accessibility Standards for Customer Service, Ontario Regulation 429/07. Integrated Accessibility Standards Regulation and Human Rights Code. 	B 5.1 Accessible Customer Service B 5.2 Accessible Employee Services	All staff, students and volunteers completed training related to the requirements of the Customer Service standard and IASR of AODA. New staff, students and volunteers to receive training as part of mandatory orientation. All staff, students and volunteers provided with Integrated Accessibility Standards & Human	January 1, 2015	Met compliance.



		Rights Code Fact Sheet.		
All websites and web content Internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A initially; Increase to WCAG 2.02 Level AA in accordance with Section 14(3) schedule.		New website planned for 2015. Will be in compliance with standard.	January 1, 2021	
Employment Standards				
Notification about available policies and accommodation for applicants with disabilities Provide suitable accommodation that takes into account the applicant's accessibility needs due to disability		Included on the careers section of the website options for accommodation for applicants with disabilities. Candidates are notified prior to interview and selection.	January 1, 2016	Met compliance.
Informing employees of supports Inform all employees of policies used to support employees with disabilities Provide new employees the information Provide updated information to employees whenever there is a change to an existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability	B 1.0 addresses the dissemination of new and revised policies.	New employees are notified of policies during new hire appointment and orientation. All employees are notified when there is a change to an existing policy.	January 1, 2016	Met compliance.
Accessible formats and communication supports for employees: Information to perform their job Information that is generally available to employees in the workplace		Provide information when requested.	January 1, 2016	Met compliance.
Workplace emergency response information If an employee who receives individualized workplace emergency response information requires assistance, and with the employee's consent, the employer shall provide this information to the person designated by the employer to provide assistance to the employee		Provide information when requested. Included on Employee Accommodation Plan.	January 1, 2012	Met compliance.



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 Individualized workplace emergency response information shall be reviewed when the employee moves to a different location in the organization; their overall accommodations needs or plans are reviewed; or when the employer reviews its general emergency response policies. 				
Documented Individual Accommodation Plans	Policy C 4.6	Updated documented	January 1,	Met
 Employees requesting individual accommodation plans may participate in the development of the plan; 	Accommodati on Plans.	process for individualized accommodation plans.	2016	compliance.
 Means by which the employee is assessed on an individual basis; 		Accommodation plan form completed with input		
 The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist in determining if accommodation can be achieved and, if so, how it can be achieved 		from employee, HR, supervisor and health care professional.		
 The manner in which the employee can request participation of a bargaining agent representative in the development of the plan 				
 Privacy protection of the employee's personal information 				
 Frequency with which the individual accommodation plan will be reviewed and updated, and the manner in which it will be done 				
 If a plan is denied, the manner in which the reasons for the denial will be provided to the employee 				
 Individual accommodation plans are in a format that takes into account the employee's accessibility needs due to disability 				
Return to Work Process	C 4.2 Short	RTW form completed with	January 1,	Met
 Develop and have in place a return to work process 	Term	input from employee, HR,	2016	compliance.
Outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work	Disability addresses RTW process.	supervisor, and health care professional.		
Use documented individual accommodation plans	•			
Performance Management	Policy C 7.3	Performance	January 1,	Met
 The use of performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual 	Performance Evaluation	management processes consider the accessibility needs of employees with	2016	compliance.



accommodation plans, when using its performance management process in respect of employee with		disabilities.		
disabilities. Career Development and Advancement Career development and advancement is provided to its employees taking into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	Integrated into policy C 2.0 Hiring Policy	Updated Recruitment Policy C 2.0. to consider the accessibility needs of employees with disabilities and accommodation plans.	January 1, 2016	Met compliance.
Redeployment The use of redeployment shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when redeploying employees with disabilities.		Review and update redeployment processes to consider the accessibility needs of employees with disabilities. Refer to individual accommodation plans and determine what modifications may be needed.	January 1, 2016	Met compliance.
Built Environment				
 Make outdoor play spaces accessible Make exterior paths of travel accessible Make parking accessible – off-street parking Make service counters, queuing guides and waiting areas accessible Maintain the accessible parts of your public spaces 		Lutherwood has taken these requirements into account when building or making major modifications to public spaces. An external consultant completed accessibility reviews on each Lutherwood site in 2016.	January 1, 2017	Met compliance.
Procedures for preventative and emergency maintenance of the accessible elements in public spaces	Policy B 5.1 LVP policy 3.1.2 Preventative Maintenance Policy 3.1.1 Corrective	Following recommendations from accessibility review. Includes Improving elevators at two Lutherwood sites. Adding in an elevator to		



Maintenance	Lutherwood sites.	

