

Key Legislated Policies

ACCESSIBILITY

Central Hastings Support Network (CHSN) is committed to upholding and exceeding Ontario's legislation intended to remove barriers to accessibility for persons with disabilities. This includes providing equal access to employment, information, goods and services, and treating persons with disabilities with dignity and respect in a way that takes their disability into account.

DEFINITIONS

Definitions taken from the *Accessibility for Ontarians with Disabilities Act*, S.O. 2005, C. 11 or *Ontario Human Rights Code*.

"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.

"Barrier" means 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, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice; ("obstacle").

"Disability" is defined broadly by the *Ontario Human Rights Code* as:

1. "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 coordination, 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,
2. a condition of mental impairment or a developmental disability,
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. a mental disorder, or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*, 1997."

POLICY

CHSN will make every reasonable effort to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)*, 2005, including all applicable elements of the *Integrated Accessibility Standards*.

1. Information and Communication
2. Employment
3. Customer Service

4. Design of Public Spaces
5. Transportation

CHSN will provide training to all employees, volunteers, and independent contractors to ensure they are familiar with our policies, practices, and procedures for communicating with and providing services to persons with disabilities.

Information and Communication

CHSN will make its information accessible to people with disabilities by creating materials and supports in accessible formats, and it will notify the public of the types of accessible formats provided.

Further, CHSN will deliver alternate formats of information to clients, upon request. If a particular material cannot be converted into an accessible format that meets the needs of the person requesting it, CHSN will provide details of why it cannot be converted and provide a summary of the information or communication in another way that is suitable to the person requesting it.

This extends to any emergency procedures or safety information prepared by CHSN.

Employment

CHSN welcomes and encourages employment applications from people with disabilities and will do its part to make hiring and employee support practices more accessible by providing accommodation during all stages of recruitment, hiring, and employment.

If a job applicant requests accommodation, CHSN will consult with the applicant and provide suitable accommodation that takes the person's accessibility needs into account.

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

New employees will be reminded about the organization's job accommodation policies as soon as possible upon being hired and notified when any future changes are made to policies. Policy and practice information will include available employment accommodations that will be provided for job related matters such as performance management, career development, emergency response plans, and return to work information.

CHSN will consult with an employee who requests it, to provide or arrange for the provision of accessible formats and communication supports that take the employee's needs into account when providing information that is needed to perform the employee's job, and information that is generally available to employees in the workplace.

Customer Service

CHSN will provide customer service in a manner that removes barriers for people with disabilities according to the following key principles of the AODA:

- Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities.
- Service to people with disabilities will be integrated with others, unless an alternate way of providing the goods, service or facility is required by the person with the disability.
- Persons with disabilities will be given equal opportunity to use and benefit from the goods, services, or facilities an organization or business has to offer.
- We will communicate with people with disabilities in a way that takes the individual's disability into account.

Assistive Devices, and Service Animals, Service Dogs or Guide Dogs

Persons with disabilities who use an assistive device will be permitted to use their own device to access the goods and services of CHSN.

If a person with a disability is accompanied by a guide dog or other service animal, CHSN shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.

Support Workers

If a person with a disability is accompanied by a support person, CHSN will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

CHSN will ensure that notice is given in advance if admission fees will be charged to support workers for accessing the goods or services in their role as support person, including how much the fee will be.

Service Interruptions

If there is a temporary disruption in any of our services either in whole or in part, CHSN will provide notice of the disruption to the public via as many channels as possible, in accessible formats, where available. We will physically post notices where the disruption is taking place as well as through any other channels that are appropriate such as email, phone, text, social media, or on our website.

Notice of the disruption will include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

Process for Receiving Feedback

CHSN will accept feedback about the way in which it provides goods and services to persons with disabilities in person, by phone or email, or in another way that is suitable to a person with a disability.

When a complaint is received about the manner in which we provide goods, services or facilities to persons with disabilities, CHSN will let the person who submitted the feedback know about the actions the organization will take to resolve the issue.

Transportation

CHSN does not provide conventional or specialized transportation services to passengers and is not required to adhere to the Transportation Standard.

Design of Public Spaces

If CHSN redesigns or redevelops an outdoor public space such as a parking area, outdoor eating area or play space, exterior path of travel, recreational trail or beach access route, or an indoor or outdoor service counter, waiting area or queuing line, it will do so in accordance the Design of Public Spaces Standard of the AODA. CHSN will also ensure any newly redesigned or redeveloped areas are maintained in accordance with the rules set out by the AODA.

HUMAN RIGHTS COMMITMENT

CHSN is committed to upholding the human rights of all employees. Specifically, CHSN will ensure that every employee has a right to equal treatment under the protected grounds and aspects of employment established by the *Ontario Human Rights Code*.

PROTECTED GROUNDS

- Age
- Ancestry, colour, race
- Citizenship
- Ethnic origin
- Place of origin
- Creed
- Disability
- Family status
- Marital status (including single status)
- Gender identity, gender expression
- Record of offences (in employment only)
- Sex (including pregnancy and breastfeeding)
- Sexual orientation

POLICY

CHSN will not discriminate against any of its employees under any of the protected grounds outlined above.

Furthermore, CHSN will ensure equal treatment for its employees, including, but not necessarily limited to, the following processes:

- Job applications
- Recruitment
- Training
- Transfers

- Promotions
- Apprenticeship terms
- Dismissal
- Layoff

CHSN will ensure that this right to equal treatment is upheld in the areas of rate of pay, overtime, hours of work, holidays, benefits, shift work, discipline, and performance evaluations.

Duty to Accommodate

CHSN has a duty to accommodate employees to eliminate negative treatment based on the prohibited grounds of discrimination. CHSN will accommodate to the point of undue hardship which can only be considered when adjustments to a policy or practice would incur financial cost, necessitate outside funding, or create risks to the health or safety of a person.

Filing a Complaint

CHSN acknowledges that an employee who believes their rights have been violated may speak to a Human Rights Officer or file a complaint with the Ontario Human Rights Tribunal. CHSN will not retaliate against any employee who has filed a complaint with the Tribunal or had someone file a complaint on their behalf.

PROTECTION OF PERSONAL INFORMATION

CHSN is committed to upholding the privacy of private and identifiable information. While CHSN is not subject to the protection obligations outlined in *the Personal Information Protection and Electronic Documents Act* (PIPEDA), this policy is based upon PIPEDA's 10 Fair Information Principles and is intended to ensure the safety of employee personal information.

DEFINITIONS

As defined by PIPEDA, personal information includes: any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type
- Opinions, evaluations, comments, social status, or disciplinary actions
- Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).

Ten Fair Information Principles

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention

6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

POLICY

CHSN will ensure that any private employee information that is collected adheres to the principles outlined below:

1. **Accountability:** CHSN is responsible for all employee personal information under its control and will ensure its accountability to the 10 Fair Information Principles.
2. **Identifying purposes:** CHSN will always identify to employees why their personal information is being collected.
3. **Consent:** Employee consent is required for the collection, use, or disclosure of employee information, as appropriate.
4. **Limiting collection:** CHSN will only collect the personal employee information that is required for the administration of pay, benefits, and other human resource activities. This information will always be collected in fair and legal ways.
5. **Limiting use, disclosure, and retention:** Unless required by law, all private employee information collected by CHSN will only be used for the purposes for which it was collected. Private employee information will only be retained as necessary to serve the purposes for which it was collected.
6. **Accuracy:** CHSN will maintain personal employee information as accurate, complete, and as up-to-date as possible. CHSN may request periodic updates from its employees to ensure that the information on file is accurate.
7. **Safeguards:** CHSN will protect any personal employee information it has collected, either by locked filing cabinets, encrypted drives, or any other means necessary to ensure the privacy of the information.
8. **Openness:** CHSN will disclose its purposes for the collection of employee information and will have this information available upon request from employees.
9. **Individual access:** Employees of CHSN have the right to view what personal employee information has been retained. Further, employees may challenge the accuracy of this information and make modifications to the information, as necessary.
10. **Challenging compliance:** While CHSN is not subject to the compliance regulations under PIPEDA, it will endeavour to meet or exceed the principles established by the Act. Should an employee bring forward a way that CHSN could improve the safety of personal employee information, they may bring it forward to the (Insert title). *Executive*

Employment Standards Policies

HIRING