

Policy Title:	Accessibility for Ontarians with Disabilities Act AODA - Royal College Customer Service Standards and Integrated Accessibility Standards Regulation (IASR)
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Revision History

Issued by:	PSOD	Original approved by:	RCDT
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Revised by:	PSOD and Royal College's legal Counsel (legislation compliance)	Revision approved by:	Chief Operating Officer

Purpose

The purpose of this policy is to set out the requirements outlined in the Accessibility for Ontarians with Disabilities Act (AODA) – Integrated Accessibility Standards Regulation (IASR) and Customer Service Standards, which the Royal College of Physicians and Surgeons of Canada (the Royal College) must comply with.

This document is organized in 4 sections:

- A) Customer Service Standards
- B) Information and Communications Standards
- C) Employment Standards
- D) Design of Public Spaces

Background

This policy has been established by the Royal College to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*.

These standards are developed to break down barriers and increase accessibility for people with disabilities in the areas of customer service, information and communications and employment.

The Royal College is governed by this policy in meeting the accessibility needs of people with disabilities.

Applicability

This policy applies to all persons employed by the Royal College, including volunteers.

*Employment standards do not apply to volunteers.

This policy is meant to replace and supersede the Royal College's 2012 AODA Customer Service Standards policy. The Royal College will maintain its accessibility policies and plans in a written accessible format that is available to the public and its employees upon request.

The Royal College will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to people with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing the Royal College's policies; and,
- all other persons who provide goods, services or facilities on behalf of the Royal College

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standard and the Integrated Accessibility Standard
- How to interact and communicate with people with various types of disabilities
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person

POLICY: Accessibility for Ontarians with Disabilities Act (AODA)

Royal College Customer Service Standards and Integrated Accessibility Standards Regulation (IASR)

- What to do if a person with a disability is having difficulty in accessing the Royal College's goods, services or facilities
- Royal College's policies, practices and procedures relating to the customer service standard.

The training will be appropriate to the duties of the employees, volunteers and other persons.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained as part of the onboarding program.

The Royal College will keep a record of the training it provides.

Statement of commitment

The Royal College is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

The Royal College will strive at all times to ensure that its policies, practices and procedures and services are available in a way that is consistent with the following core principles as outlined in the AODA.

Dignity – goods and services are provided in a manner that is respectful to persons with a disability and does not diminish the person's importance.

Independence – Accommodating a person's disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

Integration – Wherever possible, services will be provided in a manner that enables people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

Equal Opportunity – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

Multi-year accessibility plan

The Royal College will maintain its multi-year accessibility plan. The plan will be reviewed and updated at least once every five years. It will show our organization's commitment to removing barriers and preventing new ones. We will make it available to the public via our Royal College website and provide it in an alternative accessible format when requested.

Policy

Part A) Customer Service Standards

Providing goods and services to persons with disabilities

The Royal College is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

- **Communication**

We will communicate with people with disabilities in ways that take into account their disability.

We will train employees who communicate with customers on how to interact and communicate with people with various types of disabilities.

- **Telephone services**

We are committed to providing fully accessible telephone service to our customers. We will train employees to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

We will offer to communicate with customers by email, relay services or in person if telephone communication is not suitable to their communication needs or is not available.

- **Assistive devices**

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods, services. We will ensure that our employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods, services or facilities.

POLICY: Accessibility for Ontarians with Disabilities Act (AODA)

Royal College Customer Service Standards and Integrated Accessibility Standards Regulation (IASR)

• Invoicing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: (hard copy, large print, e-mail, etc)

We will answer any questions customers may have about the content of the invoice in person, by telephone or e-mail.

Use of service animals and support persons

We are committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with persons with disabilities who are accompanied by a service animal.

We are committed to welcoming persons 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 the Royal College’s premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

Notice of temporary disruption

The Royal College will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and service counters on our premises.

Feedback process

The ultimate goal of the Royal College is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback or complaints regarding the way the Royal College provides goods, services or facilities to persons with disabilities can be made in person, by email, letter or telephone and all feedback or complaints should be directed to:

Mail/in person: Royal College of Physicians and Surgeons of Canada 774 Echo Drive, Ottawa, ON K1S 5N8
Telephone: 613-730-8177; toll free 1-800-668-3740 Fax: 613-730-8830 E-mail: feedback@royalcollege.ca

Customers can expect a response to feedback or a complaint within 3 business days, by email, letter or telephone.

PART B) INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

The Royal College will ensure that its process for receiving and responding to feedback and complaints is accessible to anyone, including people with disabilities, by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, the Royal College will provide, or will arrange for the provision of accessible formats and communication supports for anyone, including people with disabilities, in a timely manner that takes into account the person’s accessibility needs due to disability. (e.g. HTML and Microsoft Word, large print, text transcripts of visual and audio information).

The Royal College will consult with the person making the request in determining the suitability of an accessible format or communication support.

The Royal College will also notify its employees and the public about the availability of accessible formats and communication supports.

POLICY: Accessibility for Ontarians with Disabilities Act (AODA)

Royal College Customer Service Standards and Integrated Accessibility Standards Regulation (IASR)

Accessible Websites and Web Content

The Royal College will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

PART C) EMPLOYMENT STANDARDS

Recruitment

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

Recruitment, Assessment or Selection Process

The Royal College will notify job applicants, when they are individually selected to participate further 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 Royal College will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

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

Informing Employees of Supports

The Royal College will continue to 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 disability. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the Royal College 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 Royal College will consult with the employee making the request.

Workplace Emergency Response Information

Where the Royal College is aware that an employee has a disability and that there is a need for accommodation, an individualized emergency response plan will be provided to the employee as soon as practicable. Information/plan will vary based on the nature of the employee's disability and their requirements.

The process for the development of documented individual accommodation (IAP) plans includes:

- How we include the employee in the development of the plan
- How we consider the employee on an individual basis
- How we would proceed in getting a medical or other expert's opinion on the accommodation of the employee and at our own expense
- How other representatives or agents may or may not be involved
- How the employee's personal information will be protected
- How often the plan will be reviewed and how it will be done
- If an **IAP** is denied, how the reasons for the denial will be provided to the employee;
- How the plan will be provided in a format that respects the individual's needs due to a disability

Any employee with a temporary or permanent disability, who requires assistance during an emergency, is requested to inform Corporate Services at buildingservices@royalcollege.ca to develop an Individualized Emergency Response Plan that will accommodate their needs in an emergency situation.

It is every employee's responsibility to provide Corporate Services with information on their support requirements in case of an emergency to better assist employees with disabilities.

Once Corporate Services receives notification that an employee requires an individualized emergency response plan we

POLICY: Accessibility for Ontarians with Disabilities Act (AODA)

Royal College Customer Service Standards and Integrated Accessibility Standards Regulation (IASR)

will work with the employee to develop a plan and inform designated emergency support employees to assist in the event of an emergency.

Documented Individual Accommodation Plans

The Royal College will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided 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.

Return to Work Process

The Royal College maintains 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 outlines the steps the Royal College 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 return to work process created by or under any other statute (i.e. the *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment

The Royal College will 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 to employees, or when redeploying employees.

PART D) DESIGN OF PUBLIC SPACES

The Royal College will incorporate accessibility requirements under the regulation when building or redeveloping a public space identified under Accessibility Standard for the Design of Public Spaces.

Modifications to this or other policies

The Royal College is committed to breaking down barriers faced by people with disabilities. No changes will be made to this policy before considering the impact on people with disabilities.

Any policy of the Royal College that does not respect and promote the dignity and independence of people with disabilities will be modified or removed. Accessibility standards will be reviewed at least every five years.

New requirements may be added over time. Whenever new or revised standards are developed under the AODA, this policy will be reviewed and updated as necessary to ensure consistency.

Definitions

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:

POLICY: Accessibility for Ontarians with Disabilities Act (AODA)

Royal College Customer Service Standards and Integrated Accessibility Standards Regulation (IASR)

- (a) any animal that is used by a person with a disability for reasons relating to his or her disability, or
- (b) if it is not readily apparent that the animal satisfies (a), any animal for which a person with a disability provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability.

Customer is the term used in the AODA Legislation to describe patrons, stakeholders or anyone else in Ontario in receipt of goods, services or facilities from the Royal College. The primary recipients of Royal College services are the Royal College Fellows, Royal College Residents, Candidates and any other individuals or organizations, such as members of the public, and members of the broader community, who may be entitled to certain Royal College services.

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

Contact Information

Mail/in person:

Royal College of Physicians and Surgeons of Canada
774 Echo Drive, Ottawa, ON K1S 5N8

Telephone: 613-730-8177; **toll free** 1-800-668-3740

Fax: 613-730-8830

E-mail: feedback@royalcollege.ca

The reception desk is staffed Monday to Friday from 7:30am to 5pm EST.