

AODA-PP: Accessible Employment, Customer Service, and Built Environment Policy	
Department: AODA Public Policies	Effective Date: 01/01/2023
Section: Accessibility for Individuals with Disabilities	Review Date: 01/01/2025
Approved By: Board of Directors	Approved Date: 02/15/2023

## PURPOSE

Noojmowin Teg Health Centre 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 centre, access information provided by the centre, or use the centre's goods and services. The centre works to identify and remove barriers and prevent new barriers for persons with disabilities as they relate to employment, receipt of goods and services, the built environment, and information and communications. The centre acts so that dignity and inclusion can be experienced by all. This policy outlines the centre's strategy for identifying, removing, and preventing these barriers.

## POLICY

### Employment

- 1.0 Noojmowin Teg Health Centre makes every effort to identify, remove, and prevent barriers to employment by developing inclusive procedures that support and accommodate persons with disabilities throughout their recruitment and employment. Whenever a candidate requires accommodation to enable them to fully participate in the recruitment and selection process, or a current employee requires accommodation in the workplace, the centre works with the individual to provide such accommodation up to the point of undue hardship.
- 2.0 Job Design: Noojmowin Teg Health Centre proactively conducts thorough job analyses to ensure new and existing job requirements are bona fide occupational requirements: that is, reasonable and made in good faith. To determine whether a requirement is bona fide, the centre ensures the following:
  - The requirement achieves a goal that is rationally connected to performing the job;
  - The requirement is adopted in good faith and fulfils a legitimate work-related purpose; and
  - The requirement is reasonably necessary to accomplish a work-related process or task.
- 3.0 Where a requirement is not bona fide, the centre evaluates and determines whether reasonable accommodations can be provided to individuals to achieve equal opportunity in the workplace. The centre always works to ensure job design is non-discriminatory, including assessing jobs and working requirements for the potential of constructive discrimination.
- 4.0 Recruitment and Hiring: Noojmowin Teg Health Centre completes recruitment and selection activities in a way that ensures dignity and inclusion for all who participate. Upon request, the centre provides candidates with reasonable accommodations during the interview and selection process. The centre consults with the candidate to arrange suitable, personalized accommodations, such as providing the application in an alternate or accessible format.
- 5.0 Noojmowin Teg Health Centre is committed to hiring decisions that are unbiased and based on qualifications and experience. The centre interview process focusses on experience and skills and will not discriminate against candidates who have a disability or require an accommodation, whether it is required during the interview process or would be required if the candidate were hired. Successful candidates are made aware of policies and supports for accommodations upon completion of the recruitment process.
- 6.0 Training and Development: Noojmowin Teg Health Centre recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnovers for all employees. To this end, all employees are treated equally regarding training opportunities, and the centre does not discriminate against employees who require accommodation when considering eligibility for training and development. We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

- 7.0 The centre aligns training and development programs to meet the needs of employees with disabilities and provides training as soon as reasonably practicable upon the person being assigned to applicable duties. Training programs are 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 centre considers employee barriers when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.
- 8.0 Emergency Response: If necessary or upon request, Noojmowin Teg Health Centre creates individualized workplace emergency response plans for employees with disabilities. The emergency response plan considers the unique challenges created by the individual's disability and the physical nature of the workplace and is created in consultation with the employee. If an employee with a disability requires assistance from a support person during an emergency, the centre designates a fellow mutually agreed upon employee to act as such. Where necessary, this employee will have the required first aid training and certification necessary to provide emergency support.
- 9.0 Customized emergency response plans are reviewed when:
- The employee moves to a different physical location in the organization;
  - The employee's overall accommodation needs or plans are reviewed; and
  - The centre reviews general emergency response policies.
- 10.0 Return to Work: Noojmowin Teg Health Centre provides a supportive return-to-work program and develops and implements return-to-work processes for employees who are absent from work due to a disability and require accommodations to return to work. The centre works with the employee to develop an individualized return-to-work plan and support the employee in the transition period by identifying and eliminating or reducing any barriers. The return-to-work process outlines the steps the centre will take to facilitate the employee's return to work and any individualized accommodation needs.
- 11.0 Redeployment: If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, Noojmowin Teg Health Centre will consider redeployment by placing the employee in an alternative position in the centre. Depending on the employee's needs, redeployment to an alternative position may be temporary or permanent. The centre will work with Human Resources Department and the employee to determine whether there is another available and suitable position to accommodate the employee's needs. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.
- 12.0 Inability to Accommodate: Noojmowin Teg Health Centre provides workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of reasonable accommodation exist, or where the creation of accommodation would create a health and safety hazard or cause unreasonable costs for the organization.
- 13.0 Where a necessary accommodation is found to cause undue hardship on the organization, the centre 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 Service**

- 14.0 Access to Goods and Services: Noojmowin Teg Health Centre seeks to provide barrier-free access to the centre's goods and services for all clients. Where barriers cannot be removed, alternate means for accessing goods or services are provided to the best of the centre's ability.
- 15.0 Support Persons and Service Animals: If a client with a disability is accompanied by a support person, Noojmowin Teg Health Centre ensures that both persons may enter the premises together and that the client is not prevented from having access to the support person. A client with a disability accompanied by a service animal may access premises that are open to the public unless otherwise excluded by law.
- 16.0 The centre waives admission fees to support persons, or when not possible, ensures the client is notified of admission costs in advance. The centre attempts to accommodate the client and support person to sit with one another. In situations where confidential information might be discussed, consent is obtained from the client before any potentially confidential information is mentioned in front of the support person.

- 17.0 Communication: Noojmowin Teg Health Centre understands the importance of accessible digital and non-digital forms of communication and does its best to provide accessible types of communication and information to all individuals with disabilities. Such accessible formats and communication supports are provided upon request in a timely manner and at no additional cost.
- 18.0 Service Disruptions: Service disruptions may occur for reasons that may or may not be within the control or knowledge of Noojmowin Teg Health Centre. In the event of any temporary disruptions to facilities or services that clients with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice.
- 19.0 When disruptions occur, the centre will:
- Post notices in the nearest accessible entrance to the service disruption;
  - Update the centre website with information about the disruption; and
  - Contact clients with reservations or appointments by any method that may be reasonable under the circumstances.
- 20.0 The centre makes every reasonable effort to indicate when services will resume and suggest alternatives that can be used during the disruption. In some circumstances, such as in the situation of unplanned temporary disruptions or emergencies, notice may not be possible.
- 21.0 Emergency Notifications: Noojmowin Teg Health Centre provides emergency and public safety information, plans, procedures, maps and warning signs at evacuation points, and any other emergency alert information in accessible formats or with appropriate communication supports, upon request. Alarm systems are both auditory and visual.
- 22.0 The centre will:
- Work with any individuals requesting information 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 in an emergency, make sure an employee is available to assist.

## Feedback

- 23.0 Noojmowin Teg Health Centre acknowledges that client and employee feedback can lead to improved service, increased clientele, a reduction in complaints, improved working conditions, and an improved workplace culture, especially as it applies to accessibility. The centre ensures that feedback can be provided by persons with disabilities through various methods. Feedback forms, along with alternate accessible methods of providing feedback, are available upon request.
- 24.0 Individuals who provide formal feedback receive acknowledgement of their feedback, along with information regarding any resulting actions based on their submitted concerns or complaints.
- 25.0 Feedback can be submitted to:
- Debbie Francis, Executive Director  
705-368-0083  
48 Hillside Road, Highway 540  
Aundeck Omni Kaning First Nation  
Postal Bag 2002, Little Current, ON P0P1K0  
info@noojmowin-teg.ca
- 26.0 Feedback can be provided anonymously if desired, and feedback remains confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. The personal information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.

## Building Accessibility

- 27.0 Noojmowin Teg Health Centre works to ensure that the built environment, including building interiors and exteriors, is designed to facilitate barrier-free access to goods, services, and employment for clients and employees. If areas of the built environment are not accessible for certain individuals with disabilities, the centre will work with the individual to provide an alternate means of access up to the point of undue hardship.

## 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: Any medical device, mobility aid, communication aid, or other aid that is specially designed to assist a person with a disability with a need related to their disability.

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

Constructive discrimination: Also referred to as adverse effect, is discrimination that unintentionally singles out a particular group, resulting in unequal treatment.

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

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

Mobility aid: Any manual or electric wheelchair, scooter, boarding chair, walker, cane, crutch, prosthesis, or other aid that is specially designed to assist a person with a disability with a need related to mobility.

Service animal: An animal that can be recognized by visual indicators such as a vest or harness that is being used by an individual with a disability for reasons relating to the person's disability.

Support person: Another person who accompanies an individual with a disability in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

## REFERENCES AND RELATED POLICY

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

*Ontario Human Rights Code (OHRC)*