

# COLLEGE OF OCCUPATIONAL THERAPISTS OF MANITOBA

## ACCESSIBILITY

*Applicable Legislation: The Accessibility for Manitobans Act (2013) and  
Customer Service Standard Regulation (2015)*

### PREAMBLE

The College of Occupational Therapists of Manitoba is the regulatory organization that protects the public and instills confidence and trust by ensuring occupational therapists are competent, ethical and accountable.

The College of Occupational Therapists of Manitoba always strives to provide its services in a way that respects the dignity and independence of all people. COTM is also committed to giving people with disabilities the same opportunity to access its services and allowing them to benefit from the same services, in the same place and in a similar way as other individuals. In compliance with the Customer Services Regulation, under *The Accessibility for Manitobans Act (2013)*, the College of Occupational Therapists of Manitoba recognizes the dignity and value of every person and will strive to meet the needs of individuals with disabilities in the provision of all services. To achieve this goal, COTM will ensure all staff is trained to receive and appropriately address any accommodation request concerning registration, complaints, continuing competence, practice issues or any other service provided by the College. COTM will create awareness that members of the public and members can direct their accommodation requests to any COTM staff.

### DEFINITION OF TERMS

In this Policy,

- (i) “the College” means the College of Occupational Therapists of Manitoba, its premises, communications, functions and services.
- (ii) “customer” means any individual, such as an applicant, COTM, member of the public or other person who may communicate or seek to communicate with and/or receive or seek to receive services from COTM.
- (iii) “accessibility” means removing barriers that prevent a person with a disability from accessing the services or participating in the regulatory activities of COTM. Related to this legislation, accessibility means giving people of all abilities opportunities to participate fully in everyday life. Accessibility refers to the ability to access and benefit from a system, service, product or environment.

(iv) “barrier” means, for a person who has a physical, mental, intellectual or sensory disability, anything that interacts with that disability in a way that may hinder the person's full and effective participation in society on an equal basis.

(v) “disability” means a condition that limits a person’s daily activities. Persons with disabilities may have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their participation on an equal basis with others. A disability, aging, an injury and other life events may temporarily or permanently affect mobility, dexterity (use of hands), vision, hearing, communication, understanding or mental health.

(vi) “service animal” means, an animal (typically a dog) trained to assist a person with a disability or health condition.

(vii) “support person” may be a paid personal worker, volunteer, a friend or a family member. A person accompanying a person with a disability to help with communication, mobility, personal care or medical needs, or to access goods or services.

(viii) “assistive device” is, but is not limited to, a tool, technology, or other mechanism that enables a person with a disability to do everyday tasks and activities such as moving, communicating or lifting. It helps the person to maintain their independence at home, at work and in the community. These devices may include, but are not limited to, a white cane, wheelchair, scooter, walker, personal oxygen tank, mini pocket recorder, portable global positioning system (GPS), magnifier and digital audio player.

## **PRINCIPLES**

### ***Principle 1 - Notice***

COTM will post a copy of this policy in the public reception area of COTM and on its website. It will also include this policy in the orientation materials provided to new staff.

### ***Principle 2 - Providing Service***

COTM is committed to excellence in serving all customers, including people with disabilities, and will carry out its functions and responsibilities in the following areas.

### ***Principle 3 - Communication***

COTM will communicate with people with a variety of communication needs or challenges.

COTM will train staff on how to interact and communicate with people with various types of disabilities.

### **3.1 Internet/Website Communication**

The COTM website is a key channel of communication between COTM and its members, and COTM and the public. COTM will endeavour to provide documents in alternate formats upon user request and maintain a simple typeface that is easy and large enough to read and where possible allow the user to increase the font size to suit their needs.

COTM will offer to provide documents in an accessible format for clients who use “text to speech” software if the documents publicly available are not suitable to their communication needs.

COTM is committed to implementing the Web Content Accessibility Guidelines (WCAG)

### **3.2 Telephone Communication**

COTM is committed to providing fully accessible telephone service to all people and will provide training to all staff to communicate effectively with all individuals over the telephone in clear and plain language and to speak clearly and slowly.

COTM will offer to communicate with clients using alternative methods to suit their communication needs (e.g. TTY -Telephone Teletype).

### **3.3 Mailing and Hard Copy Communication**

COTM is committed to providing all our customers with clear and readable materials by providing options for large print when sending out COTM documents that are usually sent out in hard copy.

### **3.4 In-Person Communication**

COTM will train staff on provisions of the legislation and tools available in when attending to visitors to the office. Where feasible, other communication tools will be made available on request from those with communication challenges.

### **3.5 Accessible Premises**

COTM maintains an office in a building that provides barrier-free access to the building and washrooms and allows entrance of service animals. Alternatively, where deemed feasible, COTM will endeavour to make alternative arrangements to enhance its premises or accessibility to its events.

### **3.6 Assistive Devices**

COTM is committed to serving people with disabilities who use assistive devices to obtain, use or access our services. We will ensure that our staff is trained and familiar with various assistive devices that may be used by individuals with disabilities while accessing our services.

#### ***Principle 4 - Use of Service Animals and Support Persons***

COTM is committed to welcoming people who are accompanied by a service animal on the parts of our premises that are open to the public. If service animals are excluded from such places by law, alternative arrangements will be made to accommodate the visitor's needs. COTM will also ensure that all staff, volunteers and others dealing with the public are properly trained on how to interact with people with disabilities who are accompanied by a service animal.

COTM is committed to welcoming people who are accompanied by a support person, whether the support person is a paid professional, volunteer, family member, or friend. Any person who is accompanied by a support person will be allowed to enter COTM's premises with his or her support person who may help with communication, mobility, personal care or medical needs. 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. Fees will not be charged for support persons.

#### ***Principle 5 - Employment***

When requested, persons with disabilities will be accommodated during recruitment, assessment and hiring processes.

#### ***Principle 6 - Emergency Information***

If or when need arises, COTM will provide customized workplace emergency information to employees who have disabilities. COTM will communicate with all staff reminding them to let the Fire Marshalls of 120 Maryland know if they may need assistance in case of an emergency.

#### ***Principle 7 - Third-party services***

COTM uses third party services to assess qualifications and administer the National Occupational Therapy Certification Examination. The Memoranda of Understanding signed with these service providers stipulates that services provided to applicants to the College must be compliant with the Customer Service Standard, under *The Accessibility for Manitobans Act*.

#### ***Principle 8 - Notice of Temporary Disruption***

COTM will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities (such as the main floor or TTY). This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at COTM's office entrance and the entrance to 120 Maryland. If the service disruption is anticipated to last more than 24 hours it will be included on the COTM's general telephone message and posted on COTM's website.

### ***Principle 9 - Training of staff***

COTM will provide training to all employees, by December 31, 2018. Subsequent training will be provided as part of the orientation of newly hired staff. Such training will be provided in-person, on-line, or through any other effective means. COTM will ensure that such training will be provided within three months of staff members commencing their duties.

Training will include the following:

- The purposes of The Accessibility for Manitobans Act and the requirements of 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 equipment or devices (e.g. TTY or relay services) that may help with the provision of goods or services to people with disabilities;
- What to do if a person with a disability is having difficulty in accessing COTM's services;
- COTM's policies, practices and procedures relating to the Customer Service Regulation
- Staff will also be trained on an ongoing basis when changes are made to this policy and/or Customer Service Standard under *The Accessibility for Manitobans Act*.

### ***Principle 10 - Roles and Responsibilities***

#### **10.1 Accountability**

The Executive Director is ultimately responsible to ensure that COTM maintains compliance with Customer Service Standard of *The Accessibility for Manitobans Act*.

#### **10.2 Feedback Process**

The goal of the COTM's Accessible Client Services Policy is to meet the needs of individuals with disabilities who need to deal with the College. Comments regarding how well our services are meeting those needs are welcomed and appreciated. Feedback regarding the way COTM provides services to people with disabilities can be made verbally, by e-mail or through written (hard-copy) correspondence. All feedback, including complaints, will be directed to the COTM Executive Director. Individuals can expect to hear back from COTM regarding their feedback within three business days, excluding weekends and public holidays. Responses may be at minimum an acknowledgement of receipt.

### 10.3 Modifications to this or other policies

COTM is committed to developing policies that respect and promote the dignity and independence of all people. Therefore, no changes will be made to this policy without considering the impact on people with disabilities. Any policy of COTM that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

#### *Principle 11 - Questions about this policy*

This policy exists to ensure access for individuals with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, the Executive Director of the College of Occupational Therapists of Manitoba.

Approved By	Original approval	Reviewed/Revised	Next Review
Council	February 2019		

**Section:** Governance

**Applicable to:** All Staff

**Approved by:** Council

**Date Established:** June 1, 2019