



Canadian College of **MASSAGE** and Hydrotherapy

Accessibility Policies, Practices and Procedures for Customer Service Accessibility for Ontarians with Disabilities Act

Prepared By



Revised and updated

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Canadian College of Massage and Hydrotherapy

Accessible Customer Service Policy

Accessibility Policies, Practices and Procedures

Executive Summary

CCMH is committed to supporting our community and improving accessibility by preventing and removing barriers for persons with disabilities. CCMH welcomes all people with disabilities into our business and will endeavor to provide a safe, comfortable and hospitable environment while maintaining the highest quality of customer service in doing so.

CCMH is dedicated to treating all people in an inclusive manner; and it is with this dedication that we shall strive to adhere to the spirit of the Accessibility for Ontarians with Disabilities Act (AODA) by affording equal opportunity and access for all.

CCMH prides itself on delivering excellence in education; and will continue to undertake measures to ensure we provide these opportunities to everyone equally.

Mission Statement

In accordance with the Accessibility for Ontarians with Disabilities Act (AODA), the Canadian College of Massage and Hydrotherapy is committed to working to improve access and opportunities for people with disabilities by identifying, removing and preventing barriers that may interfere with their ability to access our educational facility and services.

Barrier Identification

It is the obligation of each member of the Canadian College of Massage & Hydrotherapy to help identify the possibility of existing barriers which may impact prospective or existing students and potential or existing patients attempting to access the services provided by the College. The management team at CCMH will also consult with people with disabilities, (when applicable), on a periodic basis, in order to gather information and establish best practices for providing access to their goods, services and facilities.

Guiding Principles

When developing any policies, practices or procedures, the following four guiding principles will be adhered to:

Dignity

What does the principle of dignity mean?

Policies, practices and procedures which respect the dignity of a person with a disability are those designed to treat them as any other prospective or existing student, or potential

or existing patient, who are as valued and as deserving of effective and full service as any other customer. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services provided, and show respect for these methods.

Independence

What does the principle of independence mean?

In some instances, independence means freedom from control or influence of others – freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor.

Integration

What does the principle of integration mean?

Integrated services are those that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar manner as other prospective or existing students and potential or existing patients. Integration means that policies, practices and procedures are designed to be accessible to everyone including people with disabilities.

Equal Opportunity

What does the principle of equal opportunity mean?

Equal opportunity means having the same chances, options, benefits and results as others. In the case of services, it means that people with disabilities have the same opportunity to benefit from the way you provide goods or services as others. They should not have to make significantly more effort to access or obtain services. They should also not have to accept lesser quality or more inconvenience.

Application and Implementation

The policies, practices and procedures set forth within this document will apply to all staff, students, volunteers and/or contractors who are retained by, or enrolled with the Canadian College of Massage & Hydrotherapy.

- These accessibility policies will be communicated through e-mail, verbal notification and/or handouts of the document.

The Canadian College of Massage and Hydrotherapy will review any new policies, practices and/or procedures before instituting them. This will be done through the following steps to ensure that no undue hardship on the Canadian College of Massage & Hydrotherapy is being created:

- Discuss the proposed policy at the leadership team level and decide on the viability of the policy.

- If required, submit the proposed policy to legal representatives to discuss the legal viability of the policy.
- If required, send the proposed policy to the accounting department to discuss the financial viability of the policy.
- If required, seek out recommendations from appropriate disability associations or experts.
- If required, seek out the recommendations of an accessibility consultant.
- If the decision is made to implement the policy, commit the proposed policy, practice or procedure for inclusion in the Accessibility Policies, Practices and Procedures document for distribution to the appropriate personnel.
- Distribute the new standard to the appropriate parties.
- Set a date for implementation of the new standard.
- Implement the standard.

Continued Monitoring and Evaluation

The Canadian College of Massage & Hydrotherapy will work to ensure the continued monitoring and evaluation of their efforts to achieve all accessibility policies, through ongoing measurement of progress toward total inclusion. To help achieve the policy of full inclusion, the Policies, Practices and Procedures document will be reviewed annually. Additionally, this document may be reviewed and updated as necessary on a case-by-case basis.

Policies, Practices and Procedures for Existing Patients, Potential Patients and Prospective Students

Accessible Customer Service Training

The Canadian College of Massage & Hydrotherapy, (hereafter referred to as CCMH), will ensure that all full and part-time staff, students and contractors are trained in accessible customer service as required by the Accessibility for Ontarians with Disabilities Act (Part 4.2 of the Integrated Accessibility Standards Regulation, Ont. Reg. 191/11 of the AODA). Furthermore, CCMH will ensure that all parties, including staff and students, will be trained in accessible customer service. In the case of staff, this means within one year of their hire date. For students, this means before they are able to start hands-on clinical practice, scheduled to begin in the second semester of the program. In addition, all third parties contracted by CCMH will be notified of the need to be trained in accessible customer service as soon as possible with respect to the date of the contract agreement.

Finally, all employees and students representing CCMH are required to be trained in any changes or updates to these Policies, Practices and Procedures, and the Accessible Customer Service components of the AODA.

Accessible Customer Service

CCMH will ensure that all employees and students are diligent in identifying barriers which may inhibit a person from accessing the goods, services and facilities of CCMH, and to make all reasonable accommodations where no undue hardship on CCMH would be created. This will be accomplished using the following methods:

Prospective Students

- When a Prospective Student with an obvious mobility disability enters the premises, the greeting party will make a decision on how best to welcome the individual;
- If the individual is using a mobility device (i.e. wheelchair or scooter), direct communication shall be achieved by physically coming out from behind any counter or desk in order to facilitate proper eye contact;
- If the individual is using a mobility aid such as crutches or a walker, they will be offered the closest available seat before conducting any other business;
- If the individual is required to provide any information to CCMH, an agreement will be reached on how to best achieve this communication (i.e. verbally, electronically or in writing using a clipboard or other suitable writing surface).
- In order to make accommodations for any prospective students with disabilities, the following process will be strictly adhered to:
 - During the interview process, the CCMH representative will ask the individual if there are any accommodations that are required due to allergies, physical disabilities (temporary or permanent), or learning/cognitive disabilities;
 - This question is to be immediately followed up by clarifying: “I only ask this question so that we can make any reasonable accommodations you may require”;
- If accommodations are required in order for the prospective student to participate in any of CCMH’s programs, this Accessible Customer Service Policy shall be communicated to them in a manner agreed upon by both parties. The prospective student will then be required to sign and acknowledge understanding of the following:
 - The timelines and policies related to all scheduled classes, clinic and outreach programs and/or other college-related events are enforced equally for all parties. No exceptions or accommodations will be made without the proper documentation from an appropriate medical professional, along with a signed and completed Special Accommodation Request Form. (In some cases, it may be necessary for appropriate CCMH staff, or third-party representative(s), to request the permission of the prospective student to consult directly with the medical professional in question in order to reach an agreement on how to best meet the needs of the prospective student. Failure or unwillingness to grant such permission may impact the prospective student’s application, or the status of an existing student.) Additionally, any accommodation deemed to cause an undue hardship to CCMH, or which may negatively impact its students, staff or the public, may be denied. The rules and requirements for becoming a

Registered Massage Therapists are clearly defined by The College of Massage Therapists of Ontario and will be strictly upheld by CCMH.

- If a prospective student that has previously identified as having a disability enrolls in a program, the following process will be strictly adhered to:
 - A notation is to be made in the student's file (using the ACCESSIBILITY ACCOMMODATION FORM) as to the nature of the disability and what accommodations are to be considered or made.
 - If there is any supporting documentation to the nature of the disability, (either required or volunteered), it must be included in the student's file.

Patient or Potential Patient

- When an existing or potential patient with an obvious mobility disability enters the premises, the greeting party will make a decision on how best to welcome the individual;
- If the individual is using a mobility device (i.e. wheelchair or scooter), direct communication shall be achieved by physically coming out from behind any counter or desk in order to facilitate proper eye contact;
- If the individual is using a mobility aid such as crutches or a walker, they will be offered the closest available seat before conducting any other business.
- If the individual is required to provide any information to CCMH, an agreement will be reached on how to best achieve this communication (i.e. verbally, electronically or in writing using a clipboard or other suitable writing surface).
- In order to make accommodations for any potential patient with disabilities the following process will be strictly adhered to:
 - The CCMH reception staff will ask the individual if there are any accommodations that are required due to allergies, physical disabilities (temporary or permanent), or learning/cognitive disabilities.
 - This question is to be immediately followed up by clarifying: "I only ask this question so that we can make any reasonable accommodations you may require".
 - It must also be made known at this point that the time lines for all sessions are restricted to 1 hour, including all administration, consultation, set-up and treatment, and that no "extra time" accommodations can be made for any reason.
 - Once a potential patient has consented in writing to the above policy regarding time restrictions, they may be admitted as a patient.
- In order to make accommodations for any patient with disabilities the following process will be strictly adhered to:
 - A copy of the ACCESSIBILITY ACCOMMODATION FORM is to be placed in the patient's file.
 - The ACCESSIBILITY ACCOMMODATION FORM is to be completed in the patient's file as to the nature of the disability and what accommodations are to be considered or made.

- A colour coded “ACCOMMODATION” indicator is to be attached to the outside identification area of the patient’s file.
- Anyone that will be affected by the required accommodation(s) is to be notified and familiar with the necessary accommodation(s).
- Any time a patient with an “ACCOMMODATION” indicator on file is to be treated, all approved accommodations will be provided and adhered to.
- Upon completion of treatment, the following procedure will apply in order to make any adjustments to the processes regarding “Accessibility Accommodation”. This process will also be followed in the event of any new disclosure of a required accommodation:
 - The patient is to complete and/or revise the new or existing ACCESSIBILITY ACCOMMODATION FORM.
 - The completed form is to be reviewed by the clinic management staff in order to enhance future accommodations if required.

CCMH will respect the individual’s right to privacy under the Personal Health Information Protection Act and will abide by the rules of PHIPA regarding any request for information.

Feedback Process

It is the goal of CCMH to comply with the spirit of the Accessibility for Ontarians with Disabilities Act. To this end, a feedback process will be developed to enable the team at CCMH to respond appropriately to any feedback received by the organization regarding the accessible customer service provided to its prospective and existing students, or potential and existing patients alike. When feedback has been received the following action will be taken:

The management team at CCMH will review the scenario, and make every reasonable effort to accommodate the requests of the individual in a manner that is satisfactory to all parties, without causing undue hardship to CCMH.

The feedback process is to take into account the individual’s disability, and will be made available through a variety of methods such as:

- In person
- On the telephone
- In writing
- By e-mail

Methods of receiving feedback:

- Contact the appropriate office or department by telephone.
- Utilize the Customer Feedback Form and deliver it in person for distribution to the appropriate office or staff member.

- Prospective or existing students can submit open feedback, or using the structured Customer Feedback Form, via e-mail at: julieh@collegeofmassage.com (Toronto), or tatumj@collegeofmassage.com (Cambridge)
 - Potential or existing patients can submit open feedback, or using the structured Customer Feedback Form, via e-mail at: : clinicalpracticum@collegeofmassage.com (Toronto), or camclinic@collegeofmassage.com (Cambridge)
- For an example of a Customer Feedback form see Appendix A.

When feedback is received, the following actions will be taken:

- Feedback form **is** to be distributed to appropriate management team member.
- Contact the individual initiating the feedback process (using the preferred method of communication as identified) to discuss the proposed action, in a manner that takes into account the individual's disability, if applicable.
- If required, seek the recommendations of legal representation.
- If required, seek the recommendations of an organization associated with the disability in question.
- If required, seek the recommendations of an accessibility consultant.
- If it is decided that action is to be taken, the Policies, Practices and Procedures document will be updated using the Application and Implementation directives contained in this document.
- Once a course of action has been developed and instituted, the individual who initiated the feedback will be informed of this course of action.

CCMH will respect the individual's right to privacy under the Personal Health Information Protection Act and will abide by the rules of PHIPA regarding any request for information.

Communication

Any communication between CCMH and their prospective or existing students, potential or existing patients, or the public will be conducted in a manner that takes into account an individual's disability. An understanding shall be reached on how it is best to communicate with a person with a disability on a case by case basis. This may include, but will not be limited to, the following methods of communication:

- Verbal communication
- Written communication
- Digital communication which may include audio and / or electronic formats
- Hand gestures

Telephone Communication

CCMH is committed to providing accessible telephone communication. This will be accomplished through the training of all staff, students and contractors in Accessible Customer Service as per the "Training" section of this policy. They will be expected to communicate with all parties by speaking clearly, directly and using plain language. When

available and appropriate, technological aides will be used to assist with communication. When clear and precise communication over the telephone is not possible, alternative arrangements will be offered, if appropriate.

Notice of Temporary Disruption of Service

CCMH will ensure that any expected or unexpected temporary disruption of service is identified and relayed to their prospective and existing students, and potential and existing patients through the following means:

- Staff will refer to the Policies, Practices and Procedures for instructions.
- Notification of the disruption will be indicated in writing and placed on the entrance way to the effected CCMH office or area and/or on the CCMH location-specific website.

The Notification of Temporary Disruption of Service will include the following information:

- The reason for the disruption of service.
- The date of the disruption of service.
- The expected length of the disruption of service.
- A description of alternate services, if available.

For an example of a Notification of Disruption of Service form, see Appendix A.

Assistive Devices and Mobility Aids

CCMH will ensure that all staff, students and contractors are trained and familiar with any assistive devices that may be provided by CCMH. Parties representing CCMH will adhere to the following guidelines when interacting with any prospective or existing students, and potential or existing patients that require the use of an assistive device:

- Ask if the individual requires assistance.
- If assistance is required, the representative of CCMH will listen carefully to the individual's instructions, repeating them back to ensure all instructions are clearly understood and executed.
- If an individual's assistive device cannot be utilized within the offices of CCMH, other reasonable arrangements for the provision of goods and services of CCMH will be made (if possible, without causing undue hardship on the organization).
- All staff, students and contractors of CCMH will be made aware of areas, locations or offices that must be kept clear of assistive devices due to safety regulations. Reasonable alternative arrangements for access to goods and services will be made available if required, and no undue hardship would be created on CCMH, its personnel or the public.

Learning or Cognitive Disabilities

CCMH and its representatives will treat any individual that has been identified as someone with a learning or cognitive disability with the same respect and accordance given to any prospective or existing student, and potential or existing patient. The representatives of CCMH will follow the recommendations of the training provided, and the appropriate policies, practices and procedures such as:

- Ask if the individual requires assistance.
- Provide additional options for the individual's requirements, unless an undue hardship on CCMH would be created.
- Listen intently and paraphrase the question or response back to the individual to ensure full comprehension.

Service Animals

CCMH will train its staff, students and contractors in the treatment and rules pertaining to the use of service animals.

At no time will any representative of CCMH prevent an individual requiring the use of a service animal from accessing the service animal while on the premises, except where a pre-existing law prohibits the animal, and the following conditions are not met:

- The animal is an obvious service animal, wearing a harness or identifying vest.
- The person requiring the service animal can produce official paperwork from a medical or health professional practicing under one of the nine colleges cited in the Integrated Accessibility Standards Regulation (IASR), Ont. Reg. 191/11, referring to service animals.

If a situation exists where a conflict of disabilities arises, (e.g. an individual requiring the use of a service animal needs to access an area also required by an individual affected by severe animal allergies), then the following procedures will be strictly adhered to:

- Escort the individual and the service animal to a predetermined area.
- Clean the affected area once the individual leaves the premises.

These procedures will be followed in accordance with the nature of the business. Health concerns must be first and foremost; therefore, the service animal must be separated from any unnecessary contact with other individuals while allowing for the needs of the individual requiring the use of the service animal.

Support Persons

CCMH will train its staff, students and contractors in the treatment and rules pertaining to the use of support persons.

At no time will any representative of CCMH prevent an individual requiring the use of a support person from accessing the services of the support person while on the premises.

Representatives of CCMH will treat every individual with all due respect, and will direct all attention to the customer, addressing the support person only if invited or it is absolutely necessary.

During events which are held by CCMH, or any of its staff, students or contractors, for which an admission fee is to be charged, a notification of the policy concerning the admission fee for a support person will be posted.

The admission policy is as follows:

- The same fee charged to the general public will be charged to the support person.
- The option to offer a reduced rate will rest with the clinic management, or the person(s) collecting admission fees.

Alternate Formats of Communication

Upon request, CCMH will endeavour to provide reasonable alternate formats of items such as this document, forms, invoices and other applicable materials. These formats may include, but are not limited to, such communication structures as:

- Hard copy with large font type
- Electronic text
- Oral communication

Since it would cause undue hardship on CCMH to provide all materials in every alternate format, and it is not feasible to do so, all efforts will be made to reasonably accommodate any such request for information.

Contact Information:

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Tatum Johnson
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Canadian College of Massage and Hydrotherapy
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(519) 650-5533 ext 200
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Accessibility Professionals of Ontario
84 Silverbirch Place
Whitby, ON
L1R 1X5
647-477-8745
kyle@accesspros.ca

Appendix A

Accessible Customer Service Feedback

The Canadian College of Massage & Hydrotherapy would like to thank you for taking the time to fill out our Accessible Customer Service Feedback form. The Management and staff at CCMH are committed to removing the barriers which may impede the disabled community from accessing our goods and services. CCMH will review your information, and if it can be adopted without creating an undue hardship to CCMH, it will be acted on at the earliest opportunity.

General Public, Prospective Students / Students please e-mail this form to:

julieh@collegeofmassage.com (Toronto), or tatumj@collegeofmassage.com (Cambridge)

Potential Patients / Patients please e-mail or fax this form to:

clinicalpracticum@collegeofmassage.com (Toronto), or camclinic@collegeofmassage.com (Cambridge)
or Fax to: 416-736-9382 (Toronto), or 519-650-5507 Cambridge)

Date/Time of visit: _____

Optional Information

Name: _____ Phone Number: _____

Email: _____

How did you find the customer service provided to you today?

Very good Good Average Below average Poor

Comments:

How was your experience with the accessibility of our facilities?

Very good Good Average Below average Poor

Comments:

Did you have any communication issues and if so how could they be improved;

Yes No

Comments:

Any additional comments:

We at CCMH would like to thank you for taking the time to help us with our Accessibility Policies and we look forward to servicing your needs to the best of our ability.

CCMH (location)

Will be **CLOSED** from

(Date)

To

(Date)

Due to

(Reason)

The closest alternative CCMH location is

(Location)

We apologize for any inconvenience and we look forward to serving you soon.

PATIENT ACCESSIBILITY ACCOMMODATION FORM

Patient Name

Nature of Disability

Accommodation

Result of Accommodation

Accommodation Approved by

Date
