

## LHIN MULTI-YEAR ACCESSIBILITY PLAN

### INTRODUCTION AND STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the "AODA"). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations ("IASR") under the AODA require that effective January 1, 2013, the Mississauga Halton Local Health Integration Network (MH LHIN) establish, implement, maintain and document a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under the AODA, the following accessibility standards set certain requirements that are applicable to the LHIN:

- Customer Service;
- Information and Communications;
- Employment; and
- Proposed Accessibility Standards for the Built Environment

This multi-year plan outlines the MH LHIN strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill the MH LHIN's commitment as outlined in the LHIN - Accessibility Policy.

In accordance with the requirements set out in the IASR, the MH LHIN will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Post this plan on its website ([www.mississaugahaltonlhin.on.ca](http://www.mississaugahaltonlhin.on.ca));
- Report as required on its website ([www.mississaugahaltonlhin.on.ca](http://www.mississaugahaltonlhin.on.ca)) on the progress of the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

### ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

#### Commitment:

Since 2010, the MH LHIN has been in compliance with the Accessible Customer Service Regulation under the AODA, and will continue to comply with that regulation from January 1, 2013 to December 31, 2017.

The MH LHIN is committed to excellence in serving all customers, including persons with disabilities, and it will carry out its functions in a manner which delivers an accessible customer service experience.

The MH LHIN is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever

possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other customers.

**Action Taken:**

The following measures have been implemented by the MH LHIN:

- Ensuring all persons who, on behalf of the MH LHIN, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities;
- Ensuring staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing the MH LHIN's goods or services;
- Ensuring completion of accessibility training is tracked and recorded;
- Ensuring customers accompanied by a guide dog or other service animal in areas of the LHIN open to the public and other third parties, are accommodated;
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated.
- Providing customers with notice in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances and service counters on the MH LHIN premises. If the disruption is long-term, the MH LHIN posts an announcement on its website informing customers of the location, duration of the disruption and alternate solutions;
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels;
- Reporting compliance with the customer service standard on the Accessibility Compliance Reporting tool at ServiceOntario's One-Source for Business website.

**Required legislative compliance: January 1, 2010**

**Completion date: January 1, 2010**

**INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS**

**EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION**

**Commitment:**

The MH LHIN is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

**Action Taken:**

The following measures were implemented by the MH LHIN effective January 1, 2012:

- Emergency procedures, plans and public safety information that are prepared by the LHIN and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;

- An Accessible Format Request Form was developed and is available on-line on the LHIN's internal website, for completion by LHIN staff upon receipt of a request from the public for such documentation in an accessible format. In addition, an internal referral process is in place for fulfilling the accessible format request. (each LHIN must designate a point person responsible for requests)

**Required legislative compliance: January 1, 2012**

**Completion date: January 1, 2012**

## **WORKPLACE EMERGENCY RESPONSE INFORMATION**

### **Commitment:**

Where the MH LHIN is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### **Action Taken:**

The following measures were implemented by the MH LHIN effective January 1, 2012:

- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities; (a form for voluntary disclosure should be given to all new hires for accommodation request and emergency response accommodation)
- Where required, the MH LHIN provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees;
- These individualized emergency plans have been communicated to the employees' respective managers and Safety personnel, on an 'as needed' basis;
- On an ongoing and regular basis, and as per the applicable terms of the IASR, the MH LHIN will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

**Required legislative compliance: January 1, 2012**

**Completion date: January 1, 2012**

## **PROCURING OR ACQUIRING GOODS, SERVICES OR FACILITIES**

### **Commitment:**

The MH LHIN is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so, commencing January 1, 2013.

**Planned Action:**

In accordance with the IASR, the MH LHIN will implement procurement processes that:

- Use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so;
- Where the LHIN has decided that it is not practicable to incorporate accessibility criteria and features, it will provide an explanation upon request;
- Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.

**Required legislative compliance: January 1, 2013**

**Completion date: January 1, 2013**

**TRAINING****Commitment:**

The MH LHIN is committed to implementing a process to ensure that all employees who provide goods, services and facilities on the MH LHIN's behalf, and persons participating in the development and approval of the MH LHIN's policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

**Planned Action:**

In accordance with the IASR, the MH LHIN will:

- Establish an internal committee with the responsibility for developing appropriate training;
- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees who provide goods, services and facilities on the MH LHIN's behalf, and persons participating in the development and approval of the MH LHIN's policies;
- Ensure that the training is provided to persons referenced above as soon as practicable;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

**Required legislative compliance: January 1, 2014**

**Implementation timeframe: September 1, 2013 to January 1, 2014**

**Completion date: N/A**

**INFORMATION AND COMMUNICATION STANDARDS****Commitment:**

The MH LHIN is committed to making company information and communications accessible to persons with disabilities. The MH LHIN will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications

systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

## **1. Feedback, Accessible Formats and Communication Supports**

### **Planned Action:**

In accordance with the IASR, the MH LHIN will:

- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- More broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
  - Provide or arrange for the provision of such accessible formats and communication supports;
  - Consult with the person making the request to determine the suitability of the accessible format or communication support;
  - Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons;
  - Notify the public about the availability of accessible formats and communication supports.

**Required legislative compliance: January 1, 2014 – Feedback, January 1, 2015 – Accessible formats & Communication Supports (or other applicable compliance date as set out in the IASR)**

**Implementation timeframe: January 1, 2014 to January 1, 2015 (as applicable)**

**Completion date: N/A**

## **2. Accessible Websites and Web Content**

### **Accomplishments to Date:**

- AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives.

### **Planned Action:**

In accordance with the IASR, the MH LHIN will:

- Ensure development of its next generation digital platform for public websites, and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology;
- Use guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program standard, which specifies compliance with international accessibility guidelines, W3C WCAG 2.0;
- Follow the mandated Accessibility Directorate of Ontario (ADO) guidelines and Province of

Ontario I&IT solutions that support obligated Private Sector and Broader Public Sector organizations in compliance initiatives;

- Partner with Corporate Communications and, in collaboration with operating divisions, provide guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats;
- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

**Required Legislative Compliance: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR**

**Implementation timeframe: January 1, 2014 to December 31, 2017**

**Completion date: N/A**

## **EMPLOYMENT STANDARDS**

### **1. Recruitment**

#### **Commitment:**

The MH LHIN is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

#### **Planned Action:**

In accordance with the IASR, the MH LHIN will do the following:

#### **Recruitment General**

The MH LHIN will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Specifying that accommodation is available for applicants with disabilities, on the MH LHIN's website and on job postings;
- Working with suppliers to ensure external Web pages are compliant with the Information and Communication Standards under the IASR's requirements.

#### **Recruitment, assessment and selection**

The MH LHIN will notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consult with the applicant and arrange

for provision of suitable accommodations 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 MH LHIN will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of notification of LHIN's policies on accommodating employees with disabilities in offer of employment letters.

**Required legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**

### **2. Informing Employees of Supports**

In accordance with the IASR, the MH LHIN will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This will include:

- Informing current employees and new hires of MH LHIN's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process;
- Keeping employees up to date on changes to existing policies on job accommodations with respect to disability;
- Where an employee with a disability so requests it, the MH LHIN will provide or arrange for provision of suitable accessible formats and communications supports for:
  - Information that is needed in order to perform the employee's job;
  - Information that is generally available to employees in the workplace.
- In meeting the obligations to provide the information that is set out in the paragraph above, the MH LHIN will consult with the requesting employee in determining the suitability of an accessible format or communication support.

**Required legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**

### **3. Documented Individual Accommodation Plans/Return to Work Process**

#### **Commitment:**

The MH LHIN will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

**Planned Action:**

The LHIN's existing policies include steps that the MH LHIN will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

The LHIN will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

The LHIN will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Include in the process the manner in which the MH LHIN can request an evaluation by an outside medical or other expert, at the MH LHIN's expense, to assist the MH LHIN in determining if and how accommodation can be achieved;
- Steps are in place to protect the privacy of the employee's personal information;
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied;
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- If individual accommodation plans are established, ensure that they include:
  - Individualized workplace emergency response information that is required;
  - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - Information that is needed in order to perform the employee's job;
    - Information that is generally available to employees in the workplace.
- Identify any other accommodation that is to be provided to the employee.

The MH LHIN will ensure that the return to work process as set out in its existing policies outlines the steps the LHIN will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

**Required Legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**

**4. Performance Management, Career Development and Redeployment**



**Commitment:**

The MH LHIN will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities;
- When providing career development and advancement to its employees with disabilities;
- When redeploying employees with disabilities.

**Planned Action:**

In accordance with the IASR, the MH LHIN will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - Assessing performance
  - Managing career development and advancement
  - Redeployment is required
- Review, assess and, as necessary, include in Performance Management workshops, accessibility criteria;
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings;
- Take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

**Required legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**