

INTEGRATED ACCESSIBILITY STANDARDS POLICY	
Section Name: Human Resources	Section #:
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Scope: All employees	Next Review Date: 11/08/2019
Approved By: Senior Leadership Team	Date: 16/08/2016

I POLICY STATEMENT

- 1.1 The Central West CCAC is committed to ensuring that our services are accessible to all members of our community and staff, including those with disabilities. This policy seeks to formalize that commitment and ensure that our CCAC remains in compliance with the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*. CW CCAC will comply with all AODA requirements, before or by AODA-established deadlines, in the five key areas: customer service, information and communications, transportation, employment, and the built environment.

II PURPOSE

- 2.1 This policy defines the requirements and process for CW CCAC's compliance with applicable AODA guidelines. It is accompanied by the *Central West CCAC Multi-Year Accessibility Plan* ("Accessibility Plan"), which outlines the specific measures the CW CCAC will take to achieve compliance by the legislated date.

The purpose of this policy is to outline the practices and procedures in place at the CW CCAC to help identify and remove barriers that impede a person's ability to access care and services. This includes patients, families, staff and members of CW CCAC communities.

III DEFINITIONS

The AODA and Ontario Regulation 419/07 contain and refer to various definitions that are relevant to this policy, some of which are set out below.

3.1 Accessible Formats:

Refers to formats that are an alternative to standard formats and are accessible to people with disabilities. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats used by persons with disabilities.

Communication Supports:

Refers to supports that individuals with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability:

According to the Ontario Human Rights Code, a "Disability" is defined as:

- (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,

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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*

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

Personal Assistive Devices:

For the purpose of this policy, Personal Assistive Devices are personal supports used by persons with disabilities that enable them to carry out the activities of daily living and allow access to CW CCAC services. Patient-owned equipment such as power-mobility devices (power wheelchairs or scooters) are regarded as Personal Assistive Devices.

Service Animals:

an animal acting as a service animal for a person with a disability,

- (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person:

A "Support Person" accompanies a person with a disability, in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

IV GENERAL

The AODA came into force in 2005, followed by the *Accessibility Standards for Customer Service ("Customer Service Regulation")* in 2008; the latter applied to the Central West CCAC effective January 1, 2010. Please see the Customer Service Policy – Accessibility for Ontarians with Disabilities for more information on the requirements and process for the Central West CCAC's compliance with the Customer Service Regulation.

Three standards - information and communications, employment, and transportation - have been combined under the Integrated Accessibility Standards Regulation (the "IASR") and its requirements, to which CW CCAC is subject, are being phased in between 2011 and 2025.

In keeping with the principles set out in the AODA, CW CCAC is committed to providing respectful services that are centred on the unique needs of each individual. As such, the CW CCAC will focus on the identification and removal of barriers to access for people with disabilities. The following details outline the highlights of the actions CW CCAC will take to meet the IASR requirements. The multi-year plan in Appendix A will provide additional tactical details.

4.1 *Information and Communications Standard*

Under the Information and Communications Standard, the CW CCAC is required to create, provide and receive information/communications in ways that are accessible to people with disabilities. To accommodate this, CW CCAC will:

- Ensure that its internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A.
- Inform its employees of its policies (and any updates) 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 shall be provided to new CW CCAC employees as soon as practicable after they begin employment.

Upon the request of an employee with a disability, CW CCAC shall consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, CW CCAC shall consult with the employee making the request and review any supporting medical documentation.

4.2 *Employment Standard*

The Employment Standard builds upon the existing requirement under the Ontario's Human Rights Code in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship. Specifically, the Central West CCAC will ensure that the following aspects comply with this standard:

- Recruitment – CW CCAC shall notify employees and the public about the availability of accommodations for applicants with disabilities in the CW CCAC recruitment process.
- Assessment or Selection Process - CW CCAC shall notify job applicants, when they are individually selected to participate further in an assessment or selection process at CW CCAC, that accommodations are available upon request in relation to the materials or processes to be used in the assessment or selection process. If a selected participant requests accommodation, the CCAC shall 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, CW CCAC shall notify the successful applicant of CW CCAC's policies for accommodating employees with disabilities.

4.3 *Emergency Information*

Emergency procedures, plans or public safety information prepared by the Central West CCAC and made available to the public shall be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

4.4 *Workplace Emergency Response Information*

Individualized Information – CW CCAC will provide individualized workplace emergency response information to an employee who has a disability, if the disability is such that the individualized information is necessary, and if the CW CCAC employee makes CW CCAC aware of the need for accommodation due to the employee's disability. CW CCAC will provide this information as soon as practicable after becoming aware of the need for accommodation.

Employees Requiring Assistance – When a CW CCAC employee requires assistance, CWCCACCW CCAC will, with the consent of the employee, provide the workplace emergency response information to the person designated by CW CCAC to provide assistance to the employee.

Reviewing the Workplace Emergency Response Information - CW CCAC shall review the individualized workplace emergency response information developed for a CW CCAC employee when the employee moves to a different location at CW CCAC, when the employee's overall accommodations needs or plans are reviewed, and when CW CCAC reviews its general emergency response policies.

4.5 Multi-Year Accessibility Plan

The Human Resources department, in conjunction with key departmental members of the organization, representing an interim Accessibility Committee, and in consultation with persons with disabilities, has developed an Accessibility Plan which outlines a phased strategy to address the current and future requirements of the AODA. CW CCAC shall report annually to CW CCAC's Senior Leadership Team and Board of Directors on the progress and implementation of the Plan. The Human Resources department will review and update the Accessibility Plan in consultation with persons with disabilities at least once every five years. The updated Accessibility Plan will be posted on an annual basis on CW CCAC's website. Upon request, CW CCAC shall provide a copy of the Accessibility Plan to persons with disabilities in an accessible format.

4.6 Training

CW CCAC shall ensure that training is provided to all CW CCAC staff on the requirements of the Integrated Accessibility Standards Regulation as set out in this Policy and on the Human Rights Code, as it pertains to persons with disabilities. Training shall be appropriate to the duties of CW CCAC staff members and shall be provided to all CW CCAC staff as soon as practical in keeping with the AODA and on an ongoing basis when changes are made to the policies, procedures and practices. The training will include details about key principles and accessibility strategies and tools. CW CCAC staff will also receive updates when changes are made to this Policy. A record will be kept of CW CCAC staff who have received training, including (i) the dates on which training was provided, (ii) a summary of the contents of the training, and (iii) the names of the individuals to whom it was provided.

New employees and students will receive training as part of the Corporate Orientation program.

4.7 Feedback

CW CCAC shall ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, upon request. Any individual can submit feedback to CW CCAC either by phone or email details available on the CCAC's website.

4.8 Documented Individual Accommodation Plans ("IAPs")

CW CCAC shall have in place a written process for the development of documented Individual Accommodation Plans for employees with disabilities. IAPs shall include any information regarding accessible formats and communications supports provided (if requested), individualized workplace emergency response information (if required), and shall identify any other accommodation that is to be provided to the CW CCAC employee.

The process for the development of documented IAPs shall include the following elements:

- i) the manner in which an employee requesting accommodation can participate in the development of the IAP;
- ii) the means by which the employee is assessed on an individual basis;
- iii) the manner in which CW CCAC can request an evaluation by an outside medical or other expert, at CW CCAC's expense, to assist CW CCAC in determining if and how accommodation can be

achieved;

iv) the manner in which the employee can request the participation of a CW CCAC representative in the development of the IAP;

v) the steps taken to protect the privacy of the employee's personal information;

vi) the frequency with which the IAP will be reviewed and updated and the manner in which it will be done;

vii) if an IAP is denied, the manner in which the reasons for the denial will be provided to the employee; and

viii) The means of providing the IAP in a format that takes into account the employee's accessibility needs due to disability.

4.9 **Return to Work Process**

CW CCAC shall maintain a documented return to work process for 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 shall outline the steps CW CCAC will take to facilitate the return to work and shall include documented IAPs 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.

4.10 **Performance Management**

CW CCAC shall take into account the accessibility needs of employees with disabilities, as well as IAPs, when conducting performance management, **redeployment** and providing career development and advancement opportunities to CW CCAC employees.

4.11 **Reporting**

CW CCAC shall file an accessibility report with the director appointed under the AODA regarding its compliance with the Accessibility Standards. CW CCAC shall file the accessibility reports annually or at such other times as the director may specify. All filed accessibility reports shall be made available to the public upon request.

4.12 **Improving access to CW CCAC's goods and services**

The CCAC will encourage people with disabilities to use their own personal assistive devices to improve access to CW CCAC's goods and services. The following strategies will be utilized to improve access to CCAC services:

- Enabling people with disabilities to access our services by offering assistive devices and measures.
- Communicating with a person with a disability in a manner that takes into account his or her disability.
- Allowing people with disabilities to bring their guide dog or service animal with them to areas of the premises that are open to the public.
- Permitting people with disabilities who use a support person to accompany them and ensuring that a person with a disability has access to his or her support person while on our premises.
- Providing notice when facilities or services that people with disabilities rely on to access our services are temporarily disrupted.
- Establishing a process for people to provide feedback on how goods or services are delivered and explaining how CW CCAC will respond to any feedback and what action will be taken.
- It is the responsibility of every staff member to be attentive to the concerns of patients, their families and visitors and to resolve concerns related to accessibility.

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- There are a number of strategies that are available to patients, families/staff to provide feedback regarding accessibility.

V RESPONSIBILITY

5.1 Employees will:

Participate in the training provided and become familiar with, and adhere to, the policies and procedures set out in this Policy, which include but are not limited to:

- Notify the appropriate manager about changes pertaining to disability and/or the need for accommodation;
- Provide required documentation (e.g. medical certificates/notes) to inform the appropriate parties of the all details needed to facilitate an appropriate accommodation; and
- Comply with his/her return to work plan as established in accordance with the Accommodation Policy.

5.2 Managers will:

Participate in the provided training and become familiar with, and adhere to, the policies and procedures set out in this Policy, which include but are not limited to communicating with the designated individuals details pertaining to disability/need for accommodation.

5.3 Human Resources will:

Coordinate the communication, training and facilitation of accessibility needs as follows:

- Communicate accommodation opportunities to candidates and employees during the assessment/selection and job offer process.
- Support CW CCAC employees and managers with the development of individual accommodation plans to meet the documented needs of the employee.
- Work with Organizational Development to provide training regarding this policy and the Human Rights Code to all staff prior to January 1st, 2014 and all new staff during their orientation.
- Communicate any changes to this policy to CW CCAC staff as required.
- Meet reporting requirement.
- Report to SLT and Board of Directors on compliance actions annually.
- Review multi-year plan every 5 years with appropriate stakeholders.

VI ASSOCIATED DOCUMENTS

- Central West CCAC Customer Service Policy – Accessibility for Ontarians with Disabilities;
- Central West CCAC Accommodation Policy
- Central West CCAC Accommodation Procedure
- Central West CCAC - Multi-Year Accessibility Plan (Appendix A)
- Central West CCAC Emergency Preparedness plan
- Central West CCAC Building Evacuation Procedure
- Central West CCAC Early and Safe Return to Work Policy
- Central West CCAC Recruitment and Selection policy
- Central West CCAC Meeting Room Rental for External Partners Policy

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- Central West CCAC Written External Communication procedure
- Central West CCAC Notice of Temporary Disruption of Services Procedure Template
- Central West CCAC Visitor Policy
- **Attendance Management Policy**

VII REFERENCE/CONSULTATION

- 7.1 [http://CW CCACportal.accounts.ccac-ont.ca/pnp/Documents/Engagement/Written%20External%20Communication%20Procedure.doc](http://CW%20CCACportal.accounts.ccac-ont.ca/pnp/Documents/Engagement/Written%20External%20Communication%20Procedure.doc)
- Trent University Multi-Year AODA Accessibility Plan
 - Sunnybrook Accessibility Policy
 - Integrated Accessibility Standards Regulation Guidelines

Chief Executive Officer

Date

APPENDIX A

Multi-Year Accessibility Plan

Accessibility Plan and Policies for CW CCAC

This 2014-2019 accessibility plan outlines the policies and actions that CW CCAC will put in place to improve opportunities for people with disabilities.

CW CCAC 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.

Accessible Emergency Information:

CW CCAC is committed to providing our customers and patients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Training:

CW CCAC will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

CW CCAC will take the following steps to ensure employees provided with the training need to meet Ontario's accessible laws by **January 1, 2015**

- Design and develop relevant training materials in accordance with Accessibility for Ontarians with Disabilities Act by May 1st, 2014.
- Develop and finalized training plan to ensure all employees, board members and other staff are trained by December 31st, 2014.
- Make available Accessible formats of training materials, when and/if requested by employees by December 31, 2014.

Information and Communications

CW CCAC is committed to meeting the communication needs of people with disabilities. To ensure that all people are aware of this commitment, we will include a statement regarding the availability of accessible formats on our print collateral, website, and other communications materials by January 1, 2014.

Upon request, CW CCAC will provide or arrange for the provision of accessible formats and communication support for persons with disabilities, ensuring that we consult with the person making the request in determining the suitable format to be used. Such requests will be directed to the CW CCAC's communications specialist for coordination and timely consultation and response. The CW CCAC will maintain appropriate vendors on record by December 31st, 2014, that will enable the CCAC to provide accessible formats of communication support when requested. CW CCAC will acquire and implement teletypewriter (TTY) line by December 31, 2013. This electronic device for text communication over a telephone line is designed for use by persons with hearing or speech difficulties.

CW CCAC's existing website is in compliance with WCAG 2.0, Level A; upgrades to the existing site will occur before **January 1, 2014** and will remain in compliance with (or surpassing) the applicable standards.

CW CCAC will also develop and finalize a plan to achieve website and web content compliance to level AA by January 31st, 2016. This work will commence on or before June 1, 2015.

Employment

CW CCAC is committed to fair and accessible employment practices.

The following steps will be taken to notify the public and staff that, when requested, CW CCAC will accommodate people with disabilities during the recruitment and assessment process and when people are hired.

- Incorporate into CW CCAC Recruitment practice to notify all job applicants (internal and external) that persons with disabilities will be accommodated upon request throughout the Recruitment process by January 1, 2016. Written notices will be included on all internal and external job postings/advertisements, on internet/intranet, bulletin boards in the workplace, auto responses and job descriptions.
- The Human Resources Consultant or designate will verbally notify all candidates at the point of initial/first contact that CW CCAC will accommodate persons with disabilities upon request during the Recruitment process including assessments and interviews effective December 31st, 2014.

CW CCAC will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.

- Update and finalize CW CCAC Accommodation and Early and Safe Return to Work policies and procedures by April 30th, 2014 to formalize the process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.
- Implement and communicate the approved updated Accommodation and Early and Safe Return to Work policies and procedures to all employees by May 31st, 2014.

We will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if CW CCAC is using performance management, career development and redeployment processes.

- Incorporate into the CW CCAC Performance Management program and Redeployment practice to notify all employees with disabilities that they will be accommodated upon request throughout the employment relationship with the CW CCAC. This will take effect by January 1, 2016. The updated Performance Appraisal policy will be posted on the intranet site and the Performance appraisal system (halogen).
- Develop and finalize Termination/Redeployment policy/procedure by December 31, 2014 that outline the steps to ensure the accessibility needs of employees with disabilities are taken into account if/when CW CCAC embarks on the Redeployment process.
- Implement and communicate the approved updated Performance Appraisal policy and Termination/Redeployment policy/procedure to all employees by May 31st, 2015

For More Information:

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Accessible formats of this document are available free upon request. Please contact Elizabeth Leal, communications specialist at # 905-796-0040, extension 7264.