



## **Multi-Year Accessibility Plan 2013 – 2015**

**Accepted by Senior Management Team – March 6, 2014**

### **Introduction**

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA), which requires that Ontario be an accessible province by 2025. To help organizations identify, prevent and remove barriers to accessibility, AODA sets out specific accessibility standards in five areas:

- customer service
- information and communications
- employment
- transportation
- design of public spaces.

The accessibility standard for customer service came into force in 2008. The information and communications; employment; and transportation standards have been combined and enacted as Ontario Regulation 191/11, the Integrated Accessibility Standards (IAS), which are to be phased in over time. The standard for the design of public spaces, which applies to facilities and outdoor spaces, is still under development.

### **Our Commitment to Accessibility**

Sherbourne Health Centre (SHC) is committed to building an equitable and accessible Centre and ensuring that all interactions with us are provided in a way that respects the dignity, independence, integration and equal opportunity of all people, including those with disabilities. Therefore, we are committed to complying with the timelines, requirements and specifications set out in AODA.

All staff and providers have a role in achieving our accessibility goals, therefore, many of the activities in this multi-year plan entail accountabilities for various people or departments. SHC has also struck an Equity and Access Council of staff and managers from throughout the organization, whose mandate is in part to champion accessibility for people with disabilities, which includes monitoring our progress and where necessary, recommending amendments to this plan.

This plan identifies what we have already done and outlines next steps to identify and remove barriers for people with disabilities. It will guide our activities over the next five years. It may be amended to reflect changes in legislation or our services, or based on accessibility feedback from our clients/staff, or any other pertinent information.

This plan is posted on our website at: [www.sherbourne.on.ca/accessibility](http://www.sherbourne.on.ca/accessibility). To obtain this plan in an alternate format, please contact the Director, Human Resources at 416-324-4100, extension 5211 or at [info@sherbourne.on.ca](mailto:info@sherbourne.on.ca).

## **Overview**

### **A) Accessibility Standards for Customer Service**

### **B) Integrated Accessibility Standards Regulations**

#### **1. Emergency Procedure, Plans or Public Safety Information**

#### **2. Workplace Emergency Response Information**

#### **3. Training**

#### **4. Information and Communication Standards**

a. Feedback, Accessible Formats and Communication Supports

b. Accessible Websites and Web Content

#### **5. Employment Standards**

a. Recruitment

b. Informing Employees of Supports

c. Documented Individual Accommodation Plans/Return to Work Process

d. Performance Management, Career Development and Redeployment

### **C) Transportation**

### **D) Design of Public Spaces**

## **A) Accessibility Standards for Customer Service**

### **Commitment:**

The Accessibility Standards for the Customer Service Regulation were created to establish accessibility standards for customer service. In keeping with this regulation, SHC is committed to providing services that reflect the unique needs of the individual. To achieve this, SHC makes efforts to ensure that our policies, procedures and practices pertaining to the provision of services adhere to the principles set out in the Standard. Specifically:

- Our services must be provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of our services to persons with disabilities and others must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to access our services.
- Persons with disabilities must be given an opportunity equal to that given to others to access our services.

### **Action Taken:**

The following measures have been implemented:

- All staff and providers are trained to communicate and provide the most accessible services to all clients, 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 services;
- Completion of accessibility training is coordinated and recorded by Human Resources;
- Ensuring customers accompanied by a guide dog or other service animal in areas of the Centre 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.
- Issuing a public notice in a timely manner in the event of a planned or unexpected disruption or inaccessibility of services used by persons with disabilities. The notice must include the reason for the disruption, the anticipated duration, and a description of alternative facilities or service, if any, available.
- A feedback process has been implemented to ensure comments, complaints or other remarks about accessibility are managed in a transparent, consistent manner.

**Status: Complete/Ongoing**

## **B) Integrated Accessibility Standards Regulation**

### **1. Emergency Procedure, Plans or Public Safety Information**

**Commitment:**

SHC is committed to making our Centre safer for persons with disabilities during emergencies.

**Action Taken:**

The following measures have been implemented:

- Emergency procedures, plans and public safety information 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.

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

**Status: Complete**

### **2. Workplace Emergency Response Information**

**Commitment:**

Where SHC is aware that an employee has a disability and needs accommodation, individualized workplace emergency response information that reflects the employee's restrictions will be provided to the employee as soon as practicable

**Action Taken:**

The following measures have been implemented:

- New employees are asked at orientation if they will require any accommodations with respect to emergency response information. In this case, SHC will provide individualized workplace emergency response information to the employee with the disability as soon as practicable after it becomes aware of the need.

- If an employee who receives individualized workplace emergency response information requires assistance, SHC will provide the information to the person designated by the organization to provide assistance to the employee, subject to the employee's consent.
- SHC will review the individualized workplace emergency response information when:
  - the employee moves to a different location in the organization;
  - the employee's overall accommodations needs or plans are reviewed; and/or
  - SHC reviews its general emergency response policies; or
  - The employee provides new or additional information about their accommodation needs.

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

**Status: Complete/Ongoing**

### **3. Training**

#### **Commitment:**

SHC is committed to providing training to all staff and providers on the requirements of the IAS 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:**

SHC will:

- Determine and ensure that appropriate training on the requirements of the IAS and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide services SHC's behalf, and persons participating in the development and approval of the SHC's policies;
- Ensure that the training is provided as soon as practicable;
- 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 applicable policies on an ongoing basis.

**Required compliance date: January 1, 2015**

**Status: Ongoing**

### **4. Information and Communication Standards**

#### **Commitment:**

SHC is committed to making information and communications accessible to persons with disabilities.

#### **(i) Feedback, Accessible Formats and Communication Supports**

**Planned Action:**

SHC will:

- Ensure that feedback processes are accessible to persons with disabilities by providing accessible formats and communications supports, upon request. SHC will notify the public about the availability of accessible formats and communication supports.
- Provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities in a timely manner that takes into account the individuals' needs, except as otherwise provided for under the IASR.
- Consult with the person making the request in determining the suitability of an accessible format or communication support.

**Required compliance date:**

**January 1, 2015 – Feedback-related provisions**

**January 1, 2016 – Accessible formats & Communication Supports-related**

**Status: Ongoing**

**(ii) Accessible Websites and Web Content****Planned Action:**

SHC will ensure that our websites and online content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A (new websites and online content) by January 1, 2014, to Level AA for all content by January 1, 2021.

**Required compliance date:**

**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.**

**Status: Ongoing**

**5. Employment Standards****(i) Recruitment****Commitment:**

SHC is committed to making the recruitment process accessible to persons with disabilities.

**Planned Action:**

SHC will do the following:

**Recruitment**

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

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates.
- Specifying on our website and each job posting that accommodation is available for applicants with disabilities.

**Status: Ongoing**

### **Assessment and Selection**

SHC 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, processes and templates;
- Inclusion of availability of accommodation notice as part of the process when scheduling an interview and/or assessment;

If a shortlisted applicant requests an accommodation, SHC will consult with them and arrange for provision of suitable accommodations, taking into account their accessibility needs.

### **Notice to Successful Applicants**

When making offers of employment, SHC will notify the successful applicant of our policies for accommodating employees with disabilities. This will include:

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

**Required compliance date: January 1, 2016**

**Status: Ongoing**

### **Employee Supports**

#### **Commitment:**

SHC is committed to informing employees of available accessibility supports.

#### **Planned Action:**

SHC will:

- Inform its employees of our policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations as soon as practicable after they begin their employment.
- Provide updated information to employees when there is a change to existing policies.
- Where an employee with a disability requests it, consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:
  - Information that is needed in order to perform the employee's job; and
  - Information that is generally available to employees.

- SHC will consult with the employee making the request in determining the suitability of an accessible format or communication support.

**Required compliance date: January 1, 2016**

**Status: Ongoing**

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

#### **Commitment:**

SHC is committed to providing employee accommodation and return to work processes, to the fullest extent possible.

#### **Planned Action:**

SHC's existing policies will be reviewed to include to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

Thus:

- SHC will review and assess 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.
- SHC will ensure that the process for the development of documented individual accommodation plans includes the following elements:
  - How an employee requesting accommodation can participate in the development of the individual accommodation plan.
  - The means by which the employee is assessed on an individual basis.
  - The manner in which SHC can request an evaluation or supplementary information by an outside medical or other expert, at SHC's expense, to assist in determining if, and how, accommodation can be achieved.
  - The manner in which the employee can request the participation of their union.
  - The steps taken to protect the privacy of the employee's personal information.
  - The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
  - If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
  - The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs.

Individual accommodation plans will:

- If requested, include any information regarding accessible formats and communications supports provided, as required in the Standard;
- If required, include individualized workplace emergency response information, as required in the Standard; and
- Identify any other accommodation options that can be provided.

SHC will ensure that the return to work process as set out in its existing policies outlines

the steps the employer 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 compliance date: January 1, 2016**

**Status: Ongoing**

### **Performance Management, Career Development and Redeployment**

#### **Commitment:**

SHC 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:**

SHC will:

- Review, assess and, as necessary, modify existing policies, procedures, practices and templates to ensure compliance with the IAS;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - o Assessing performance
  - o Managing career development and advancement
  - o Redeployment is required.

**Required compliance date: January 1, 2016**

**Status: Ongoing**

### **C) Transportation**

#### **Commitment:**

The Transportation standard is not applicable to SHC.

**Status: Not Applicable**

### **D) Design of Public Space**

#### **Commitment:**

While it is believed that the Design of Public Space standard will not be applicable to SHC, efforts have been made to improve accessibility for people with disabilities. Specifically:



**Action Taken:**

The following measures have been implemented:

- Elevators have been retro-fitted with audio announcements to assist people who are visually impaired.
- Additional automatic door openers have been installed on washrooms (at least one per floor) to assist people with physical restrictions.

**Status: Ongoing (Complete by March 31, 2014)**