

Central Local Health Integration Network Multi-Year Accessibility Plan (2017-2021)

INTRODUCTION

The Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) is a provincial act with the aim to create a fully accessible province by 2025. The AODA outlines the guidelines and timelines that all businesses and organizations in Ontario must follow to identify, remove and prevent barriers to accessibility as a means to achieving accessibility with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. Currently, there are five standards in place under the AODA: Customer Service, Information and Communications, Employment, Transportation and Design of Public Spaces. The Central Local Health Integration Network (LHIN) strives to meet the accessibility and accommodation requirements as prescribed in the AODA.

CENTRAL LHIN’S STATEMENT OF COMMITMENT

Central Local Health Integration Network (LHIN) believes in treating all people in a way that allows them to maintain their dignity and independence. We support the full inclusion of persons with disabilities as set out in both the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA). The LHIN is 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 AODA.

PLAN PURPOSE & OVERVIEW

This multi-year Accessibility Plan outlines the Central LHIN’s strategy to prevent and remove barriers and improve opportunities for people with disabilities.

In working towards its goals to provide a barrier free environment to persons with disabilities, Central LHIN will act conscientiously and in keeping with its own policies and with relevant legislation.

In accordance with the requirements set out in the Integrated Accessibility Standard, Central LHIN will:

- Establish, review and update this plan in consultation with persons with disabilities
- Post this plan on its website, www.centrallhin.on.ca
- Report as required on its website on the status 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 (5) years

The LHIN recognizes that much of the service we provide is actually delivered in individual client homes. We are committed to honouring the spirit and intent of the policy in all situations.

The tables on the following pages set out the specific deliverables that Central LHIN has identified in its Accessibility Plan along with key dates. The LHIN has reached compliance for the applicable standards required to date. One outstanding Communication standard mandated for completion in 2021 for designated public sector organizations, is in the works as captured in the plan below.

**MULTI-YEAR ACCESSIBILITY PLAN
Central LHIN**

PART I – GENERAL REQUIREMENTS				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next steps
Accessibility policies (s.3)				
Develop, implement, and maintain policies re: accessibility in compliance with regulation. (s.3.1)	January 1, 2014	<p>Policies developed, implemented and electronically posted and available in accessible format on request.</p> <p><u>Accessibility Policies:</u> Accessible Customer Service Accessible Employment Disability Accommodation</p> <p><u>Additional Policies Addressing Accessibility:</u> Fire & Evacuation Procurement Recruitment & Selection Return to Work Visitor Policy</p>	Completed and on-going	<p>Review of accessibility policies annually as part of status review.</p> <p>Routinely review website and intranet links.</p>
Include statement of commitment. (s.3.2)	January 1, 2014	Commitment Statement included in both Accessible Customer Service and Accessible Employment policies and the Multi-year Plan posted on the website and intranet.	Completed	
Written documents, publicly available in accessible format. (s.3.3)	January 1, 2014	<p>Website includes Accessibility Page containing:</p> <ul style="list-style-type: none"> • Accessible Customer Service and Accessible Employment Policies 	Completed and on-going	<p>Post new form to facilitate requests for accessible format and communication support.</p> <p>Routinely review website and intranet links.</p>

		<ul style="list-style-type: none"> Links to the Multi-Year Plan and Status Report, accessible formats available on request. 		
Accessibility Plans (s.4)				
Develop, implement, maintain, document multi-year accessibility plan which outlines strategies to prevent and remove barriers. Post on website. Review and update every five years. Review and update plans in consultation with persons with disabilities. Post Annual Status Report on Website (s. 4.1, 4.2, 4.3)	January 1, 2014	<p>2017-2021 Accessibility Plan currently posted and available in accessible format on request.</p> <p>2014-2018 Accessibility Plan initially posted.</p> <p>Plans developed and reviewed in consultation with cross functional Advisory Group (representing Facilities, Communications, Occupational Health & Safety, Human Resources, Home & Community Care, Quality, Risk & Patient Safety, Information Technology) and persons with disabilities.</p> <p>2019 Annual Status Report posted and available in accessible format on request.</p>	Completed and on-going	<p>Continue to review plan at least once every 5 years.</p> <p>Post status report annually.</p> <p>Extend representation on Advisory Group to a participant of the Patient and Family Advisory Committee (non-employee).</p> <p>Investigate expansion of Advisory Group to provincial/regional for continued accommodation and accessibility best practice sharing.</p>
Procurement (s.5)				
Incorporate accessibility design, criteria, features when procuring/acquiring goods, services, facilities (s.5)		Where practicable, accessibility criteria have been incorporated when procuring or acquiring goods, services and facilities.	Completed and on-going	
Training (s.7)				
Ensure relevant training re: Standards and Ontario Human Rights Code is provided to employees, volunteers, persons involved in policy development, persons who provide goods, services, or facilities on behalf of organization. (s.7.1,7.2,7.3)	January 1, 2015	Introduced new accessibility training module incorporating IASR, Accessible Customer Service, Human Rights and Communication Tools training. This is mandatory training for all employees and available to all staff as a refresher through written transcript or on the learning management system. Accessibility policies are introduced at orientation. Additional role specific training is available for some occupations.	Completed and on-going	Introduce annual accessibility training report requirement for service provider agencies.

		Contractual provisions support training at service provider organizations.		
Ongoing training re: policy changes. (s.7.4)	January 1, 2015	Occurs as required. Method of training/education is dependent on the nature of change, and may include team meetings, bulletins, or self-directed training modules.	On-going	Explore opportunities to promote IASR, policies and support tools through additional avenues to reinforce training on an annual basis.
Keep record of training provided. (s.7.5)	January 1, 2015	The Learning Management System (LMS) is the primary source for training records. The record includes the name of participants, date and time the training was taken. Historic records additionally available in the HRIS/Payroll System.	Completed and on-going	

PART II IASR - INFORMATION & COMMUNICATION STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next steps
Feedback (s.11)				
Feedback mechanisms must be accessible to persons with disabilities – by providing accessible formats and communications supports. Notify public re: above. (s.11.1, 11.2, 11.3)	January 1, 2015	Website invites feedback and provides options to give feedback by telephone, TTY, in person, and in writing. Accessible Customer Service policy specifies alternate means of communication supports for feedback.	Completed and on-going	
Accessible formats and communications supports (s.12)				
Provide accessible formats and communications supports upon request (timely, same cost, in consultation)	January 1, 2016	Accessible formats shall be provided or arranged to be provided in a timely manner taking into account	Completed and on-going	Post new form to facilitate requests for accessible format and communication support.

Consult with person making request re: suitability of format. Notify public re: above. (s.12.1, 12.2, 12.3)		the person's disability and at no additional cost to the individual. Key documents and accessibility training materials are prepared in a conversion-ready format.		
Emergency procedure, plans, public safety information (s.13)				
If organization prepares emergency procedures, plans, public safety information, make available to public in accessible formats on request. (s.13.1)	January 1, 2012	Emergency procedures, plans and safety information prepared by the LHIN for the public shall be provided in accessible format/with appropriate communication supports as soon as practicable on request. The Fire and Evacuation Policy is available in accessible format on request.	Completed and on-going	
Accessible websites and web content (s.14)				
Confirm to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) initially at Level A and increasing to AA. (applies to websites/content including web-based applications, that an organization control directly or through a contractual relationship that allows for modification of the product and web content published after 2012 (s.14.2, 14.4, 14.5, 14.6, 14.7)	January 1, 2014 – new websites January 1, 2021 all websites	January 2014 requirement met and on-going collaboration across LHINs to support maintained compliance.	2014-Completed and on-going 2021–not started	Develop plan to achieve the 2021 compliance (Requirement for all internet websites and website content to conform with WCAG 2.0 Level AA (excluding live captioning/audio description).

PART III IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Action/Next Step
Recruitment, general (s.22)				
Notify employees and public about the availability of accommodation for applicants with disabilities. (s.22)	January 1, 2016	All external job postings contain notice that accommodations are available during the recruitment/selection process on request to Human Resources.	Completed and on-going	

		<p>Notice also identified in the Accessible Employment Policy posted on the website.</p> <p>Accommodation shall be provided in accordance with the Ontario Human Rights Code and AODA.</p>		
Recruitment, assessment or selection process (s.23)				
Advise applicants invited to participate in assessment process that accommodation is available. (s.23.1)	January 1, 2016	<p>Notification statement included on the application form and external career site. Interview candidates are provided the opportunity to request an accommodation during interview confirmation process.</p> <p>Training provided to interview coordinators addresses accommodation needs during the assessment process if requested.</p>	Completed and on-going	
Upon request, consult with applicant re: suitable accommodation (s.23.2)	January 1, 2016	Human Resources will consult with the person with disability regarding accommodation needs and coordinate with the interviewing manager to establish an appropriate strategy to address accommodation needs.	Completed and on-going	
Notice to successful applicants (s.24)				
Notify successful applicants of policies for accommodating. (s.24)	January 1, 2016	Awareness is incorporated in to the on-boarding process through the offer letter, orientation presentation, and mandatory training on policies, standards and communication tools.	Completed and on-going	
Informing employees of supports (s.25)				
Inform employees of policies to support employees with disabilities, including policies on job accommodation as soon as practicable after hire. Policy changes and updates to be provided on on-going basis. (s.25.1, 25.2, 25.3)	January 1, 2016	<p>Accessibility training is mandatory for staff. The eLearning module is assigned during corporate orientation for new hires.</p> <p>The Human Resources Presentation on day one of corporate orientation provides an overview of the policies.</p>	Completed and on-going	

		Employees will be notified and educated on significant changes to the accessibility policies.		
Accessible formats for employees (s.26)				
Upon request, provide accessible formats and communications support re: information required to perform job, information generally available in workplace. Consult with employee. (s.26.1, 26.2)	January 1, 2016	New staff are asked to identify required supports/accessible formats on New Hire Package submitted to Human Resources. A <i>Request for Accessible Format or Communication Support Form</i> is also available for completion. On request, consultation with the employee will occur.	Completed and on-going	
Workplace emergency response information (s.27)				
Provide individualized workplace emergency response information to employees who have a disability where necessary. With consent, provide information to individual designated to provide assistance to disabled employee. Review individualized workplace emergency response information when: employee moves to different location, employees overall accommodation needs are being reviewed, when general emergency response policies are being reviewed. (s.27.1, 27.2, 27.3, 27.4)	January 1, 2012	On request, individual response plans will be developed for those with an identified disability (permanent or temporary) requiring support in an emergency. New hires identify if a need exists on the new hire package presented on the first day of employment. Details of required assistance will be identified on an Emergency Assistance form. Requirements will be review on an annual basis as a minimum as per policy, as well as at times of employee transfer, relocation, with changes in need and at time emergency response plans are reviewed. Fire and evacuation policy outlines the process for sharing information with the individual designated to provide assistance.	Completed and on-going	Review on-site Emergency Response poster content and location to determine if enhancements would be beneficial.
Documented individual accommodation plans (s.28)				
Written process for development of documented individual accommodation plans. Process to include specific elements listed. [employee participation, accessible format, individual assessment,	January 1, 2014	Disability Accommodation and Return to Work policies identify process, procedure and requirements for individual accommodation plans which will be documented in the employee's file.	Completed and on-going	

employer to cover cost of medical evaluation, Bargaining Unit participation] (s.28.1, 28.2, 28.3)				
Return to work process (s.29)				
Have in place a documented return to work process that makes use of documented individual accommodation plans per s28. (s.29.1, 29.2, 29.3)	January 1, 2016	A Return to Work policy and procedure is in place to guide the development of individual accommodation needs based on abilities and limitations of the employee.	Completed and on-going	
Performance management (s.30)				
Must take into account the accessibility needs and individual accommodation plans of employees. (s.30.1, 30.2)	January 1, 2016	Progressive discipline, performance improvement plans and professional development activities will take in to account the needs of employees with identified disabilities.	Completed and on-going	
Career development and advancement (s.31)				
Must take into account the accessibility needs and individual accommodation plans of employees. (s.31.1, 31.2)	January 1, 2016	Individual accommodation needs will be taken in to account when employees are considered for positions internally. Internal application questionnaires ask candidates if accommodation is required during the selection process. When employees with an accommodation plan are successful for job postings, Human Resources will send notification to Occupational Health and the receiving manager so accommodations plans can be reviewed and communicated.	Completed and on-going	
Redeployment (s.32)				
Must take into account the accessibility needs and individual	January 1, 2016	Should redeployment occur, the needs of employees with disabilities will be taken in to account.	Completed and on-going	

accommodation plans of employees. (s. 32.1, 32.2)				
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PART IV.1 Design of Public Spaces Standards (Accessibility Standards for the Built Environment)				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Action/Next Steps
Exterior Paths of Travel and Obtaining Services (s.80)				
Make exterior paths of travel accessible. Make parking accessible. Make service counters, queuing guides and waiting areas accessible. Maintain the accessible parts of your public spaces. (s. 80.1, 80.2, 80.3, 80.4)	January 1, 2017	Accessibility standards for the built environment were considered in the recent redesign of the Sheppard, Newmarket and Markham office spaces. Service Counters have been designed at accessible heights, and waiting areas are accessible.	Complete and on-going	Incorporate related criteria on the Office Inspection Checklists for the Joint Health and Safety Committee.

PART IV.2 Customer Service Standards					
Ref	Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Action/Next Steps
Policies (s. 80)					
	Develop, implement and maintain policies regarding goods, services, facilities in a manner that respects dignity and independence, is integrated, and provides equal opportunity. Policies to address use of Assistive Devices, Service Animals and Support persons. Notice to be provided in conspicuous places. (s.80.46, 80.47)	January 1, 2012	Accessible Customer Service Policy is in place and details posted on the website and internal intranet site.	Complete and on-going	On-site signage and visitor logs will be reviewed for enhanced communication options.
	Provide notice of temporary disruptions in goods, services,	January 1, 2012	Process identified in the Accessible Customer Service Policy. Subject to this requirement may	Completed and on-going	

facilities, including reasons for disruption, duration, alternatives available (s.80.48)		include such things as accessible parking, washrooms, elevators or power doors to public entrances. Notice may be posted on the Central LHIN website, on premises of the event or by other means reasonable to the circumstance.		
Provide training to employees, volunteers, policy developers, others providing goods, services and facilities. Training to include purposes of the Act, instruction regarding how to interact/communicate with various types of disabilities, assistive devices/support animals, how to use support tools.(s. 80.49)	January 1, 2012	Training is provided to all employees and those who provide services on the LHIN's behalf. Training module includes how to interact and communicate with various types of disabilities, assistive devices, support animals and how to use support tools.	Complete and on-going	
Establish and document process for receiving and responding to customer (and employee) feedback. Prepare document describing feedback process to provide to persons providing feedback and make available in conspicuous spaces (s.80.50)	January 1, 2012	The LHIN website and Accessible Customer Service policy address the feedback process (which can be provided by phone, TTY, email, face to face or other format/communication support necessary and available).	Completed and on-going	
On request, documents will be provided to a person with a disability in an accessible format or with the communication support they require. (s.80.51)	January 1, 2010	The LHIN shall consult the person making the request and provide the documents/information contained on the documents in an accessible format that takes into account the disability in a timely manner and at the regular cost to the individual.	Completed and on-going	

For more information on this accessibility plan, please contact **Colin Hill, Senior Director Human Resources:**

Phone: 905-948-1872 extension 5575; **Email:** colin.hill@lhins.on.ca

For accessible formats of this document, please make requests to **Cheryl Cheung, Director Communications:**

Phone: 905-948-1872 extension 2295 ; **Email:** Cheryl.cheung@lhins.