HOME AND COMMUNITY CARE SUPPORT SERVICES MISSISSAUGA HALTON

MULTI-YEAR ACCESSIBILITY PLAN

Home and Community Care Support Services Mississauga Halton will do its part to identify, remove and prevent barriers, and provide services and employment which are accessible to all persons. This Plan will highlight both the obligations and our accomplishments as we move forward in meeting the needs of all people.



Summary of Commitment

Referencing our Statement of Organizational Commitment policy, the Organization is committed to the principles of independence, dignity, integration, and equality of opportunity described in the Accessibility for Ontarians with Disabilities Act (AODA) and to meeting the needs of people with disabilities, in a timely manner. The Organization will establish and maintain associated policies and practices that support the AODA, and will remain committed to ongoing improvements to accessibility for all persons.

Overview of Legislation

The Accessibility for Ontarians with a Disability Act (AODA) was passed in 2005 with a goal of enhancing accessibility in the province and includes Ontario Regulation 191/11 which provides legislation to protect the rights of persons who have a disability.

The purpose of the Accessibility for Ontarians With Disabilities Act, 2005 (AODA) is to benefit all Ontarians by developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities regarding goods, services, facilities, information, accommodation, employment, buildings, structures and premises on or before January 2025. The AODA is a law passed by the Ontario legislature that allows the government to develop specific standards of accessibility and to enforce them. The standards are made into laws called regulations that provide the details to help meet the goal of the AODA.

A disability is defined as any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and includes:

- diabetes
- epilepsy
- brain injury
- any degree of paralysis
- amputation
- lack of physical co-ordination
- blindness or visual impediment

- deafness or hearing impediment
- muteness or speech impediment
- physical reliance on a guide dog or other service animal
- reliance on a wheelchair or other remedial appliance or device

The definition also includes a condition or mental impairment or a developmental disability, learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language, mental disorder, or an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997. This broad definition includes disabilities of varying severity, visible as well as non-visible disabilities, and disabilities of which the effects may come and go.

Standards of the Accessibility for Ontarians with Disabilities Act

The purpose of the Accessibility Standards is to move organizations in Ontario forward on accessibility. The standards set out and measure, policies, practices or other requirements for the identification and removal of barriers with respect to goods and services, information, facilities, accommodation, employment, buildings, structures, premises or other such things as may be prescribed and for the prevention of the erection of barriers. They also require the persons or organizations named or described in the standard to implement those services, policies, practices or other requirements within the time periods specified in the standard.

The Accessibility for Ontarians with Disabilities Act has developed and implemented five standards which will provide regulatory compliance. These five standards are:

- Customer Service
- Information and Communication
- Employment
- Transportation (not applicable to the Organization)
- Built Environment (legislation in development)

The regulation divides organizations into five categories.

SERVICES DE SOUTIEN À DOMICILE **ET EN MILIEU COMMUNAUTAIRE**

Mississauga Halton

- 1. Government of Ontario and the Legislative Assembly
- 2. Large designated public sector organizations with 50+ employees
- 3. Small designated public sector organizations with 1-49 employees
- 4. Large organizations (private and not-for-profit) with 50+ employees
- 5. Small organizations (private and not-for-profit) with 1-49 employees

An organization's requirements and timelines for compliance depend on which of these classes it falls under. As per the Standards Policy and Coordination Branch of Accessibility Directorate of Ontario, in order to lay a foundation and incrementally build toward an accessible Ontario by 2025, the Customer Service Standard was implemented first. Given their important role in providing healthcare services to members of the public, Local Health Information Networks (LHINs, now operating as Home and Community Care Support Services) were specifically named as "designated public sector" organizations under the Customer Service Standard. LHINs were required to comply with this standard by January 1, 2010. The Integrated Accessibility Standards Regulation only designates organizations as public sector if they are named as "public bodies" under the Public Service of Ontario Act, 2006. At this time, LHINs are not designated as public bodies and, therefore, follow the compliance timelines for private/notfor-profit organizations.

Ontario Human Rights Code

Organizations have current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

The Integrated Accessibility Standards Regulation does not replace or affect existing legal obligations under the Ontario Human Rights Code and other laws in respect to accommodation of people with disabilities. Organizations must comply with both pieces of legislation.

The Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act both deal with accessibility, but are two very different pieces of legislation. The Ontario Human Rights Code is an individual, complaints-based legislation that addresses discrimination. The Integrated Accessibility Standards Regulation, created under the Accessibility for Ontarians with Disabilities Act, applies to all organizations in Ontario and will increase accessibility for all.

The Ontario Human Rights Code requires organizations to accommodate people with disabilities to the point of undue hardship.

The Integrated Accessibility Standards Regulation does not replace or affect legal rights or obligations that arise under the Ontario Human Rights Code and other laws relating to the accommodation of people with disabilities. This means that the Ontario Human Rights Code or other applicable legislation may require additional accommodation measures that go beyond or are different from the standards established by the regulations of the AODA.

Customer Service Standard

Accessible Customer Service is the first standard that was developed to become a regulation. It came into force on January 1, 2008 and is now law. The standard addresses business practices and training needed to provide better customer service to people with disabilities.

The next three standards – Information and Communications, Employment, and Transportation – have been combined under one regulation, the *Integrated Accessibility Standards Regulation*. This regulation is now law and the requirements currently in regulation were implemented between 2011 and 2021.

Integrated Accessibility Standards Regulation

Part 1 - General Requirements

Section 3 – Establishment of Policies, Procedures & Best Practices

Section 4 - AAccessibility Plans

 $Section \ 7-Training$

Part 2 - Information and Communications Standard

Section 11 – Feedback

Section 12 - Accessible Formats & Communication Supports

Section13 - Emergency Procedures, Plans or Public Safety Information

Section14 - Accessible Website & Web Content

Part 3 – Employment Standards

HOME AND COMMUNITY CARE SUPPORT SERVICES Mississauga Halton

SERVICES DE SOUTIEN À DOMICILE ET EN MILIEU COMMUNAUTAIRE Mississauga Halton

Section 22 – Recruitment General

Section 23 - Recruitment Assessment or Selection Process

Section 24 - Notice to Successful Applicants

Section 25 - Informing Employees of Supports

Section 26 - Accessible Formats & Communication Supports for Employees

Section 27 - Workplace Emergency Response Information

Section 28 – Documented Individual Accommodation Plans

Section 29 – Return to Work Process

Section 30 - Performance Management

Section 31 - Career Development & Advancement

Section 32 – Redeployment

Part 4 – Transportation Standard

The requirements in the Transportation Standard will help transportation providers as well as municipalities, universities, colleges, hospitals and school boards make their services and vehicles accessible to people with disabilities.

This standard is not applicable to the Organization.

Built Environment Standard

The Accessibility Standards for the Built Environment is focused on removing barriers in two areas:

- 1. public spaces, and
- 2. buildings

Accessibility Standard for the Design of Public Spaces

The standard for the design of public spaces only applies to new construction and major changes to existing features. Here are

the highlights of what the standard covers:

- Recreational trails/beach access routes Not applicable to the Organization
- Outdoor public eating areas like rest stops or picnic areas Not applicable to the Organization
- Outdoor play spaces, like playgrounds in provincial parks and local communities Not applicable to the Organization
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals Not applicable to the Organization
- Accessible parking (on and off street) Not applicable to the Organization
- Service-related elements like service counters, fixed queuing lines and waiting areas
- Maintenance and restoration of public spaces

Multi-year Accessibility Plan

This accessibility plan outlines the policies and actions that the Organization has and will put in place to improve opportunities for people with disabilities, which in turn will have the Organization:

- meet our accessibility requirements within required timelines specified in the Integrated Accessibility Standards Regulation;
- address any current accessibility barriers; and
- prevent and remove future barriers

This plan will be posted on the Organization's internet and intranet.

This plan will be reviewed at minimum every five (5) years.

Deadline (Jan.1)	Act Section and Description	Action	Status	Responsibility
	Part II: Information and Communication	on Standards		
12	13. Emergency Procedures, Plans or	HOME & COMMUNITY CARE	Completed	Facilities
20	Public Safety Information.	SUPPORT SERVICES		

Emergency procedures, pl public safety information p to the public shall be proving accessible formats or with appropriate communication supports as soon as practice request.	rovided provide public safety information; however, we have visitors in our reception area, elevator waiting area, and meetings rooms. Il upon ✓ Emergency exit signage ✓ Evacuation and floor plans posted
Part III: Employment Standar	S
27. Workplace Emergency Res Information.	onse
 Provide individualized wo emergency response informemployees who have a distemployee who received individualized workplace emergency response informerequires assistance and with employee's consent, the enshall provide the workplace emergency response informed the person designated by the employer to provide assist the employee. Employer will provide information as soon as practicable after employer becomes aware employer becomes aware employer. 	kplace communicated √ Employee Emergency bility. Information Profile form developed and implemented for use Action √ Employees are asked at the time of offer, and during new hire corporate orientation if emergency assistance is needed. √ Reminders to staff are provided semi-annually nce to √ Review of emergency assistance requirements are done at modified work/return to work meetings

HOME AND COMMUNITY CARE SUPPORT SERVICES

SERVICES DE SOUTIEN À DOMICILE ET EN MILIEU COMMUNAUTAIRE Mississauga Halton

			T	
	 need for accommodation due to the employee's disability Every employer shall review the individualized workplace emergency response information, a. when the employee moves to a different location in the organization; b. when the employee's overall accommodations needs or plans are reviewed; and c. when the employer reviews its general emergency response policies. 	weeks of advisement to develop individual emergency plans		
	Part I: General Requirements		1	
2014	 3. Establishment of accessibility policies. Organizations shall develop, implement and maintain policies governing how it achieved or will achieve accessibility through meeting the requirements referred to in this Regulation. Specifically all policies shall include a statement of corporate commitment for meeting accessibility needs of persons with disabilities in a timely manner. 	 √ Statement of Commitment policy for the Organization was developed, approved, and communicated, and posted on our intranet and internet sites. √ Policy is reviewed at minimum every two years 	Completed	Human Resources Communications

Make the document available to the public and provide in accessible format upon request.				
 4. Accessibility Plan. Establish, implement, maintain and document a multi-year accessibility plan which outlines the Organization's strategy to prevent and remove barriers and meets its requirements. Post plan on website. Prepare annual status report and post to website. Provide the plan/report in accessible format upon request. Review and update the accessibility plan at least once every five years. 	√	Multi-Year Accessibility Plan for the Organization was developed, approved, and communicated, and posted on our intranet and internet sites. Plan is reviewed at minimum every five years to determine if the Organization is on-track for meeting our requirements, highlight accomplishments that have been made, and make any adjustments needed in order to meet the timelines under the Integrated Accessibility Standards Regulation	Completed	Human Resources Communications Employee and Labour Relations
Part II: Information and Communicatio	n S	tandards		
14. Accessible websites and web content.	1	OALHIN builds and maintains corporate web sites for all LHINs.	Completed	Communications
Organizations shall make its internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and shall do so in accordance with the schedule	√ √	A new site for all LHINs launched the week of December 2, 2013 which conforms with regulations the Organization micro-sites format is rolled into the new corporate site		

	 set out in this section. Part I: General Requirements 7. Training. Organizations shall provide training as soon as practicable to all employees, volunteers and other persons such as contractors or other temporary staff (paid or unpaid)about achieving the requirements in the Integrated Accessibility Standards Regulation, as well as the Ontario Human Rights Code as it relates to people with disabilities. Must keep a record of the dates when the training was offered and number of participants. 	 ✓ All the Organization employees, students, volunteers, consultants are required to complete AODA Customer Service e-learning module within one month of start and is tracked and reported ✓ Review relevant legislation ✓ Develop content for AODA/IASR/OHRC training ✓ Develop options and determine method for training ✓ Confirm training record process and systems ✓ Implement and complete training for all required persons ✓ Update new hire/agency/consultant checklists 	Completed	Human Resources Communications Employee and Labour Relations
		 √ Update new hire/agency/consultant checklists with training requirements and schedule n Standards 		Human Resources
2015	Organizations shall ensure that all processes for receiving and	√ Develop communication strategy to ensure all employees, clients, community, etc. are aware of feedback process	Completed	Communications Employee and Labour

	responding to feedback are accessible to everyone including people with disabilities. • Process for receiving and responding to feedback to ensure that the processes are accessible or arrange for accessible formats upon request. • Notify the public about the availability of accessible formats and communication supports.	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Communicate to the college community that alternate formats of the feedback process will be provided upon request Annual CCEE survey randomly conducted throughout MISSISSAUGA HALTON community Brochures available in multiple languages with Client Appeals and Complaints options described including information on the availability of accessible formats and communication supports Feedback from employees provided and received in multiple formats (email, letters, phone calls, written surveys, team/dept./portfolio meeting		Relations Learning and Organizational Development
	Part II: Information and Communication	n Si	tandards		
	12. Accessible formats and communications supports.	1	The Organization will provide accessible formats and communication upon request	Completed	Communications
2016	 Upon request provide or arrange for the provision of accessible formats and communication supports. Provide In a timely manner 	√	To be accessible to people with disabilities, the Organization will review accessible formats and communication supports		

• 1	At a cost that is no more than the regular cost charged to other persons. Consult with the person making the request in determining the accessible format or communications supports. Notify the public about the availability of accessible formats				
	and communication supports.				
Par	t III: Employment Standards				
22.	Recruitment – general. Organizations shall notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment process.	√ √	Development, approval and communication of Recruitment and Selection policy and procedure by March 31, 2014 Public and staff are notified on the careers section of internet and intranet websites regarding the Organization's commitment to, where needed and/or requested, providing internal and external job applicants' accommodations for disabilities to support their participation in all aspects of the recruitment process. Public and staff are notified on internal and external postings the Organization's commitment to, where needed and/or requested,	Completed	Human Resources

	providing internal and external job applicants' accommodations for disabilities to support their participation in all aspects of the recruitment process.		
selection process.Notify job applicants, when they are	 √ Development, approval and communication of Recruitment and Selection policy and procedure by March 31, 2014 √ Update all recruitment documents and tools (phone screens, interview guides, interview set up checklist, offer/transfer checklists, employment agreement templates) to include notification of available recruitment related accommodation, support and accessibility 	Completed	Human Resources
 24. Notice to successful applicants. When making offers of employment, organizations shall notify the successful applicant of its policies for accommodating employees with disabilities. 	√ Offer/transfer checklists and modified/return to work checklists include statements advising an employee with a temporary or permanent disability of their entitlement to an individualized emergency	Completed	Human Resources

	evacuation plan and the process to follow when required (in effect since 2012) √ Development, approval and communication of Recruitment and Selection policy and procedure by March 31, 2014 √ Update all recruitment documents and tools (phone screens, interview guides, interview set up checklist, offer/transfer checklists, employment agreement templates) to include notification of available recruitment related accommodation, support and accessibility
 Informing employees of supports. Inform employees of its new and existing policies for supporting its employees with disabilities, including, but not limited to policies on the provision of employment related accommodations that take into account an employee's accessibility needs due to disability. 	 ✓ As soon as practicable, the Organization will provide new and existing employees information from policies, procedures, protocols, legislation on accommodation ✓ The Organization will provide ongoing education and guidance to all employees to maintain awareness of policies, procedures, protocols, legislation, as well as supports and facilities available Completed Human Resources Employee and Labour Relations Organizational Development

employees.

SERVICES DE SOUTIEN À DOMICILE ET EN MILIEU COMMUNAUTAIRE Mississauga Halton

Management Program and

SUPPORT Mississau	SERVICES ga Halton		
			Т.
			1

26. Accessible formats and communications supports for

the following:

format/support

28. Documented individualized

accommodation plans.

• Employer to consult with employee requesting the accommodation for

a) Information that is needed in order to perform job.b) Information that is generally available to employees.c) Employer to consult with employee on suitable

√ √	Update and revise orientation formats and materials Develop and incorporate relevant information into the Organization's Disability Management Program and related tools		
\ \ \	Develop and incorporate relevant information into the Organization's Disability Management Program and related tools Once advised of the need, the Organization will consult with employees with disabilities to determine which accessible formats or communications supports are required for accommodation that will enable jobs to be done effectively General related information will be available to all staff via different media (policy, newsletters, intranet, bulletin boards, verbally)	Completed	Employee and Labour Relations
V	Develop and incorporate relevant information into the Organization's Disability	Completed	Employee and Labour Relations

Mississauga Halton

SERVICES DE SOUTIEN À DOMICILE ET EN MILIEU COMMUNAUTAIRE

Mississauga Halton

•	Employers, other than employers
	that are small organizations, shall
	develop and have in place a written
	process for the development of
	documented individual
	accommodation plans for employees
	with disabilities

- the process for the development of documented individual accommodation plans shall include the following elements:
 - 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
 - 2. The means by which the employee is assessed on an individual basis.
 - 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.
 - 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining

- related tools

 √ Review existing
 accommodation processes to
 identify elements of AODA
 and OHRC requirements that
 need to be incorporated into
 existing accommodation
- ✓ Review, refresh and communicate existing
 Accommodation policy

process

- √ develop individual accommodation plans for employees with disabilities inclusive of legislated requirements
- √ Update Accommodation plans as needed to remain effective.

Mississauga	Halton

- agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- 5. The steps taken to protect the privacy of the employee's personal information.
- 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- Individual accommodation plans shall,
 - a. if requested, include any information regarding accessible formats and communications

supports provided, as described in section 26; b. if required, include individualized workplace emergency response information, as described in section 27; and c. identify any other accommodation that is to be provided.			
 Shall develop and have in place a return to work process for its employees who have been absent from work due to disability and required disability related accommodations in order to return to work. Shall document the process and steps the employer will take to facilitate the return to work. use individual documented accommodation plans, as described in section 28, as part of the process. 	 √ Review existing modified and return to work processes √ Develop and incorporate relevant information into the Organization's Disability Management Program √ Connect to Accommodation policy √ Connect to WSIB Program 	Completed	Human Resources Employee and Labour Relations
 Organizations shall take into consideration the accessibility needs of employees with disabilities and 	 √ The Organization will implement and take into account the accessibility needs of individuals with disabilities, as well as accommodation 	Completed	Employee and Labour Relations Learning and Organizational

HOME AND COMMUNITY CARE **SUPPORT SERVICES**

Mississauga Halton

all individualized plans when developing performance management documents, tools and resources.	V	needs with regard to informal and formal performance management processes, tools and resources (verbal and written) Such documents related to performance management, including performance plans, will be available in accessible formats, as requested.		Development
 31. Career development and advancement. When providing career development and advancement to employees, organizations shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans. 	√	Review existing processes and revise as necessary to incorporate legislative requirements	Completed	Human Resources Employee and Labour Relations Learning and Organizational Development

2016	 Organizations shall take into consideration the accessibility needs as well as accommodation plans when redeploying employees with disabilities. 	emp references then	iew redeployment resses for possible barriers revise as necessary to rporate legislative irements, so that individual mmodation plans for their loyees with disabilities are red to and used to rmine what modifications be needed to accommodate in their new jobs.	Completed	Employee and Labour Relations
2017	 Make exterior paths of travel accessible Make parking accessible Make service counters, queuing guides and waiting areas accessible Maintain the accessible parts of applicable public spaces 	√ Rev requ plan appl man ram	iew approved legislation irements with renovation s in consultation with icable building agement/landlords (e.g., ps, stairs, curbs, sidewalks walkways)	Completed	Facilities
N	Part II: Information and Communication Standards				
2021	 14. Accessible websites and web content. Organizations shall make its internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 	intra cont	Organization's internet and anet websites and web ent will conform with slative requirements	Completed	Communications

HOME AND COMMUNITY CARE SUPPORT SERVICES Mississauga Halton

SERVICES DE SOUTIEN À DOMICILE ET EN MILIEU COMMUNAUTAIRE Mississauga Halton

		2.0 Level AA and shall do so in accordance with the schedule set out in this section.		
--	--	---	--	--

To obtain this document in an alternate format or for additional information, please contact Maureen Buchanan, Director, Communications and Engagement at 905-855-9090 x7899, Maureen.Buchanan@lhins.on.ca.

Links to Regulations

Ministry of Economic Development, Trade and Employment - IASR homepage

AODA: Customer Service Standard

AODA: Integrated Accessibility Standards
AODA: Built Environment Standard

References/Consultations/Related Documents

- Karen Dobbie, Director, People Planning and Services
- Ann De Krey, Director, People Development and Engagement
- Executive Council
- Leadership Team
- Organization's Policy: Customer Service Accessibility for Ontarians Disability Act (AODA)
- Organization's Policy: Integrated Accessibility Standards Statement of Organizational Commitment
- Organization's Procedure: Accessibility of Ontarians Disability Act Workplace Emergency Response Information
- Organization's Health and Safety Policy
- Organization's Employee Emergency Information Profile form
- North Simcoe Muskoka LHIN Multi-year Accessibility Plan 2012-2021
- Peel Regional Police Multi-year Accessibility Plan 2013-2018
- Centennial College Multi-year Accessibility Plan 2013-2015

• Accessibility for Ontarians Disabilities Act, 2005, http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm

Approvals

-	Developer	Organizational Approval
Name/	Karen Dobbie	Jutta Schafler Argao
Title	Director, People Planning & Services	Vice President, Quality & People
Signature	tavent obbie	
Date	December 29 th , 2021	

Version Control

Reviewer	Effective Date	Comments
Karen Dobbie	February 2 nd , 2023	Reviewed Plan
Karen Dobbie	December 29th, 2021	Updated progress report
Josh Sinka	December 10 th , 2019	Updated progress report
Lori Deeley	December 17, 2013	New for AODA compliance