# Home and Community Care Support Services Central Multi-Year Accessibility Plan Status Report

December 29, 2023

The Central Local Health Integration Network (LHIN), operating as Home and Community Care Support Services Central (HCCSS), is committed to identifying, removing and preventing barriers to accessibility and improving opportunities for people with disabilities.

Progress towards goals identified in the Multi-Year Accessibility Plan are outlined in this Annual Status Report.

# **Part I – General Requirements**

# Accessibility policies (s.3)

**Requirement/Standard:** Develop, implement, and maintain policies re: accessibility in compliance with regulation. Including statement of commitment. Policies to be available in accessible format as requested. (s.3.1, 3.2, 3.3)

Deadline and Status: January 1, 2014 Completed, on-going

Action Taken: Policies developed, implemented and electronically posted on the website and available in an accessible format on request.

Accessibility Policies (contain Commitment Statement):

- Accessible Customer Service
- Accessible Employment
- Disability Accommodation

Additional Policies Addressing Accessibility:

- Fire and Evacuation
- Procurement
- Recruitment and Selection
- Return to Work
- Visitor Policy
- Accessible Formats and Information for Patients and Members of the Public



# Accessibility Plans (s.4)

**Requirement/Standard:** 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)

Deadline and Status: January 1, 2014 Completed, on-going

**Action Taken:** Multi-Year Accessibility Plan currently posted, available in accessible format on request.

Plans developed, and reviewed in consultation with cross-functional Advisory Group and persons with disabilities.

Annual Status Reports posted, and available in accessible format on request.

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# **Procurement (s.5)**

**Requirement/Standard:** Incorporate accessibility design, criteria, features when procuring/acquiring goods, services, facilities. (s.5)

Deadline and Status: January 1, 2013 Completed, on-going

Action Taken: Where practicable, accessibility criteria have been incorporated when procuring or acquiring goods, services, facilities.

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# Training (s.7)

**Requirement/Standard:** Ensure relevant training re: Standards, 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. Ongoing training is required when policy changes occur. Training records to be maintained. (s.7.1, 7.2, 7.3, 7.4, 7.5)

Deadline and Status: January 1, 2015 Completed, on-going

**Action Taken:** Updated mandatory accessibility training to one module incorporating Human Rights, Integrated Accessibility Standard Regulation (IASR), Accessible Customer Service and Communication Tools training.

Training assigned on hire and available at all times through written transcript and the Learning Management System (LMS). Additional role specific training is available for select occupations.

Retraining occurs with significant changes in policy or new policies, e.g. Accessible Formats and Information for Patients and Members of the Public for staff and Board Members. Records of individual participation are maintained in the LMS. Contractual provisions support training at service provider organizations.

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# Feedback (s.11)

**Requirement/Standard:** Feedback mechanisms must be accessible to persons with disabilities – by providing accessible formats, communications supports. Notify public re: above. (s.11.2, 11.2, 11.3)

Deadline and Status: January 1, 2015 Complete, on-going

**Action Taken:** Website invites feedback and offers different methods to provide feedback by telephone, TTY, in person, or in writing.

Accessible Customer Service Policy specifies alternate means of communication supports for feedback.

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## Accessible formats, communications supports (s.12)

**Requirement/Standard:** Provide accessible formats, communications supports upon request (timely, same cost, in consultation). Consult with person making request re: suitability of format. Notify public re: above. (s.12.1, 12.2, 12.3)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: Accessible formats shall be provided or arranged to be provided in a timely manner taking into account the person's disability. This shall occur at no additional cost to the individual. Key public documents and accessibility training materials are prepared in a conversion-ready format.

# **Emergency procedure, plans, public safety information (s.13)**

**Requirement/Standard:** If organization prepares emergency procedures, plans, public safety information, make available to public in accessible formats on request. (s.13.1)

Deadline and Status: January 1, 2012 Completed, on-going

**Action Taken:** Emergency procedures, plans, safety information prepared by HCCSS 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.

## Accessible websites, web content (s.14)

**Requirement/Standard:** Confirm to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) initially at Level A, increasing to AA. Applies to websites/content including web-based applications that an organization controls directly or through a contractual relationship that allows for modification of the product, web content published after 2012. (s.14.2, 14.4, 14.5, 14.6, 14.7)

Deadline and Status: January 1, 2014 - new websites, 2014-Completed, on-going

January 1, 2021 - all websites, 2021-Completed, on-going

**Action Taken:** January 2014 requirement met, on-going collaboration across LHINs to support maintained compliance.

New external website: healthcareathome.ca/central - as of January 2021 requirement met, on-going collaboration across HCCSSs to support maintained compliance.

# Part III IASR - Employment Standard Recruitment, general (s.22)

**Requirement/Standard:** Notify employees, public about the availability of accommodation for applicants with disabilities. (s.22)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: Inclusion statement on external job postings and the following statement included: "Candidates requiring accommodation should advise Human Resources. Support will be provided in accordance with the applicant's needs and in accordance with the Ontario Human Rights Code and the Accessibilities for Ontarians with Disabilities Act."

Notice also identified in the Accessible Employment Policy posted on the website.

"We are hiring" and information on accessibility and accommodation is posted on the provincial website accessibility page.

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## Recruitment, assessment or selection process (s.23)

**Requirement/Standard:** Advise applicants invited to participate in assessment process that accommodation is available. Upon request, consult with applicant re: suitable accommodation. (s.23.1, 23.2)

Deadline and Status: January 1, 2016 Completed, on-going

**Action Taken:** 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.

Training provided to interview coordinators addresses accommodation needs during the assessment process if requested.

Human Resources will consult with the person with disability regarding accommodation needs, coordinate with the interviewing manager to establish an appropriate strategy to address accommodation needs.

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#### Notice to successful applicants (s.24)

**Requirement/Standard:** Notify successful applicants of policies for accommodating. (s.24)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: Awareness is incorporated in to the on-boarding process through the offer letter, orientation presentation, and mandatory training on policies, standards, communication tools.

#### Informing employees of supports (s.25)

**Requirement/Standard:** Inform employees of policies to support employees with disabilities, including policies on job accommodation as soon as practicable after hire. Policy changes, updates to be provided on on-going basis. (s.25.1, 25.2, 25.3)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: Accessibility training is mandatory for staff and assigned during corporate orientation. Day one of corporate orientation provides an overview of the accessibility resources/policies.

Employees will be notified, educated on significant changes to the accessibility policies.

Dedicated role of Disability Management Specialist supports Accommodation and Return to Work programs for staff.

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## Accessible formats for employees (s.26)

**Requirement/Standard:** Upon request, provide accessible formats, communications support re: information required to perform job, information generally available in workplace. Consult with employee. (s.26.1, 26.2)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: New staff are asked to identify required supports/accessible formats on New Hire Package submitted to Human Resources. On request, consultation with the employee will occur.

## Workplace emergency response information (s.27)

**Requirement/Standard:** 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, employee overall accommodation needs are being reviewed when general emergency response policies are being reviewed. (s.27.1, 27.2, 27.3, 27.4)

Deadline and Status: January 1, 2012 Completed, on-going

**Action Taken:** On request, individual response plans will be developed for those with an identified disability (permanent or temporary) requiring support in an emergency.

Details of required assistance will be identified in writing.

Requirements will be reviewed on an annual basis as a minimum as per policy, as well as at times of employee transfer, relocation, with changes in need, at time emergency response plans are reviewed.

The Fire and Evacuation Policy outlines the process for sharing information with the individual designated to provide assistance. The policy was updated in April 2022 to reflect changes to office space.

June 2022 – Emergency Response Handbook includes Self-Assessment, Employee Emergency Information Worksheet to assist employees in self-identifying if assistance is required during an emergency.

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#### **Documented individual accommodation plans s.28**

**Requirement/Standard:** Written process for development of documented individual accommodation plans. Process to include specific elements listed. [employee participation, accessible format, individual assessment, employer to cover cost of medical evaluation, Bargaining Unit participation]. (s.28.1, 28.2, 28.3)

Deadline and Status: January 1, 2014 Completed, on-going

Action Taken: Disability Accommodation, Return to Work policies each identify process, procedure, requirements for individual accommodation plans which will be documented in the employee's file. The organization's Disability Management Specialist works through this process with employees based on the validated individual needs. This includes involvement of a bargaining agent's executive specializing in return to work.

#### Return to work process (s.29)

**Requirement/Standard:** Have in place a documented return to work process that makes use of documented individual accommodation plans per s28. (s.28.1, 28.2, 28.3)

Deadline and Status: January 1, 2016 Completed, on-going

**Action Taken:** A Return to Work policy, procedure is in place to guide the development of individual accommodation needs based on abilities, limitations of the employee. Each return to work plan is documented on a standardized return to work form.

## Performance management (s.30)

**Requirement/Standard:** Must take into account the accessibility needs, individual accommodation plans of employees. (s.30.1, 30.2)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: Progressive discipline, performance improvement plans, professional development activities will take in to account the needs of employees with identified disabilities.

#### Career development, advancement (s.31)

**Requirement/Standard:** Must take into account the accessibility needs, individual accommodation plans of employees. (s.30.1, 30.2)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: 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 the Disability Management Specialist, and the receiving manager so accommodations plans can be reviewed, communicated.

### **Redeployment (s.32)**

**Requirement/Standard:** Must take into account the accessibility needs, individual accommodation plans of employees. (s.32.1, 32.2)

Deadline and Status: January 1, 2016 Completed, on-going

Action Taken: Should redeployment occur, the needs of employees with disabilities shall be taken into account.

# Part IV.1 Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

## **Exterior Paths of Travel, Obtaining Services (s.80)**

#### **Requirement/Standard:**

- Make exterior paths of travel accessible.
- Make parking accessible.
- Make service counters, queuing guides, waiting areas accessible.
- Maintain the accessible parts of your public spaces.

#### (s.80.1, 80.2, 80.3, 80.4)

#### Deadline and Status: January 1, 2017 Completed, on-going

Action Taken: Accessibility standards for the built environment were considered in the last redesign of office spaces. Service Counters have been designed at accessible heights, waiting areas are accessible. For a large portion of 2020 through 2023 the majority of employees worked remotely from a home office location. As necessary the Disability Management Specialist was engaged with employees requiring support.

# Part IV.2 Customer Service Standards

#### Policies (s.80)

#### Accessible Customer Service

**Requirement/Standard:** Develop, implement, maintain policies regarding goods, services, facilities in a manner that respects dignity, independence, is integrated, and provides equal opportunity. Policies to address use of Assistive Devices, Service Animals, Support persons. Notice to be provided in conspicuous places. (s.80.46, 80.47)

Deadline and Status: January 1, 2012 Completed, on-going

Action Taken: Accessible Customer Service Policy is in place, details posted on the website, internal intranet site.

#### **Temporary Disruptions in Goods, Services, or Facilities**

**Requirement/Standard:** Provide notice of temporary disruptions in goods, services, facilities, including reasons for disruption, duration, alternatives available. (s.80.48)

Deadline and Status: January 1, 2012 Completed, on-going

Action Taken: Process is identified in the Accessible Customer Service Policy. Subject to this requirement may include such things as accessible parking, washrooms, elevators or power doors to public entrances.

Notice may be posted on our organizational website, on premises of the event or by other means reasonable to the circumstance which may include direct notification.

#### Training

**Requirement/Standard:** 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)

Deadline and Status: January 1, 2012 Completed, on-going

Action Taken: Training is provided to all employees, and those who provide services on behalf of HCCSS (by their employer).

The training module includes how to interact and communicate with individuals with various types of disabilities, assistive devices, support animals, how to use support tools.

#### Feedback

**Requirement/Standard:** Establish, document process for receiving, responding to customer (and employee) feedback. Prepare document describing feedback process to provide to persons providing feedback, make available in conspicuous spaces. (s.80.50)

Deadline and Status: January 1, 2012 Completed, on-going

**Action Taken:** Healthcareathome website, 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, available).

#### **Accessible Formats**

**Requirement/Standard:** 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)

#### Deadline and Status: January 1, 2010 Completed, on-going

Action Taken: HCCSS shall consult the person making the request, provide the documents/ information contained on the documents in an accessible format that takes into account the disability in a timely manner, at the regular cost to the individual.

For more information on the accessibility plan, please contact:

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