

## North West LHIN: Multi-year Accessibility Plan

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disability Act (the “AODA”). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (“IASR”) under the AODA require that effective January 1, 2013, the North West LHIN establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under the AODA, the following accessibility standards set certain requirements that are applicable to the North West LHIN:

- Customer Service;
- Information and Communications;
- Employment; and
- Proposed Accessibility Standards for the Built Environment

This multi-year plan outlines the North West LHIN’s strategy to prevent and remove barriers to address the current and future requirements of AODA, and in order to fulfill the North West LHIN’s commitment as outlined in the North West LHIN – Accessibility Policy.

In accordance with the requirements set out in the IASR, the North West LHIN will:

- Establish, review and update this plan in consultation with persons with disabilities and the Accessibility Advisory Committee;
- Post this plan on its website ([www.northwesthin.on.ca](http://www.northwesthin.on.ca));
- Report as required on its website ([www.northwesthin.on.ca](http://www.northwesthin.on.ca)) on the progress 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 years.

### Statement of Commitment

The North West Local Health Integration Network (LHIN) is committed to treating all people in a way that allows them to maintain their dignity and independence. The North West LHIN believes in inclusion and equal opportunity. The North West 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 Accessibility for Ontarians with Disabilities Act.

## **ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE**

Since 2010, the North West LHIN has been in compliance with the Accessible Customer Service Regulation under the AODA, and will continue to comply with that regulation from January 1, 2013 to December 31, 2017.

The North West LHIN is committed to excellence in serving all members of the public, including persons with disabilities, and it will carry out its functions in a manner which delivers an accessible customer service experience.

The North West LHIN is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same goods and services, in the same place and in a similar way as all other members of the public.

### **Action Taken:**

The following measures have been implemented by the North West LHIN:

- Ensuring all persons who, on behalf of the North West LHIN, deal with the public or other third parties, and all those who are involved with the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our clients, are trained to communicate and provide the best possible customer service to all members of the public, including persons with disabilities;
- Allowing all persons with disabilities to provide their own assistive device for the purpose of obtaining, using and benefiting from the LHIN's goods and services that are made available to the public;
- Ensuring staff are trained and familiar with various assistive devices that may be used by people with disabilities who are accessing the North West LHIN's goods or services;
- Ensuring those accompanied by a guide dog or other service animal in areas of the North West LHIN open to the public, are accommodated. . In the event that a fee is charged in relation to a support person's presence on the North West LHIN premises or to attend a LHIN-sponsored event, advance notice of the fee is provided;
- Providing reasonable efforts to provide notice in the event of a planned or unexpected disruption in the facilities or services where the North West LHIN has control over such facilities or services by posting this notice in visible places on our premises or on the LHIN's website, or by any other method that may be reasonable under the circumstances. This notice includes information about the reasons for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.
- Ensuring completion of accessibility training by all employees, volunteers and others who deal with the public on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures;
- Ensuring all new staff receive the required training during orientation;

- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels;
- An “Accessibility” tab has been added to the website [www.northwestlhin.com](http://www.northwestlhin.com), to communicate the North West LHIN's accessible customer service policy including related procedures and guidelines; and
- Reporting compliance with the customer service standard on the Accessibility.

*Required legislative compliance: January 1, 2010*

*Completion date: January 1, 2010*

### **INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS**

#### **General Requirements**

##### Accessibility Policies

The North West LHIN will develop, implement and maintain policies about what our organization will do to meet the IASR requirements and become more accessible.

##### *Planned Action:*

In accordance with the IASR, the North West LHIN will:

- Create a Statement of Commitment to establish our vision and goals for accessibility.
- Update existing policies to include:
  - Information and Communications Standards
  - Employment Standards
- Post policies and statement on their website, internally for employees, and available by request.
- Review policies annually to ensure they are up-to-date and accurately reflect our organization and its practices.

*Required legislative compliance: January 1, 2013*

*Completion date: January 1, 2013*

##### Accessibility Plans

The North West LHIN will outline the steps in order to comply with Ontario's accessibility laws and prevent and remove accessibility barriers.

##### *Planned Action:*

In accordance with the IASR, the North West LHIN will:

- Set out how they will meet accessibility requirements under the IASR on time (timeline)
- Address any current barriers to accessibility
- Prevent and remove future barriers
- Post the plan on their website, available upon request, and in an accessible format when asked.
- Review and update their plan every 5 years. When plan is updated, the accomplishments will be highlighted.
- Prepare an annual update on what has been done to achieve our accessibility plan. This update will be posted on our website, available upon request and in an accessible format when requested.

*Required legislative compliance: January 1, 2013*

*Completion date: January 1, 2013*

### Procurement or acquiring goods, services or facilities

The North West LHIN is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.

#### *Planned Action:*

In accordance with the IASR, the North West LHIN will implement procurement processes that:

- Make accessibility design and features part of their criteria for procurement, where possible.
- Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.
- Include accessibility information within procurement policies and procedures.
- Take accessibility criteria, technical features and structural features into consideration.
- If the North West cannot incorporate accessibility into their purchase, when asked, they will:
  - Explain why they did not obtain assessable goods, services or facilities, and
  - Provide the explanation in an accessible format.

*Required legislative compliance: January 1, 2013*

*Completion date: January 1, 2013*

### Training

The North West LHIN is committed to implementing a process to ensure that all employees who provide goods, services and facilities on the North West LHIN's behalf, and persons participating in the development and approval of the North West LHIN's policies, are provided

with appropriate training on the requirements of the IASR 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:*

In accordance with the IASR, the North West LHIN will:

- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees who provide goods, services and facilities on the North West LHIN's behalf, and persons participating in the development and approval of the North West LHIN's policies;
  - For all current employees, a training program will be delivered through training sessions.
  - For all future employees, training will be part of their orientation.
- Provide job specific training to those positions needing tailored training for their roles i.e. communications, procurement, reception to meet the IASR requirements.
- Keep and 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 prescribed policies on an ongoing basis.

*Required legislative compliance: January 1, 2014*

*Implementation timeframe: September 1, 2013 to January 1, 2014*

*Completion date: N/A*

### **Information and Communication Standards**

The North West LHIN is committed to making company information and communications accessible to persons with disabilities. The North West LHIN will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

### **Emergency Information**

The North West LHIN is committed to keeping all people safe in case of an emergency.

*Action Taken:*

The following measures were implemented by the North West LHIN effective January 1, 2012:

- Upon request, the North West LHIN's emergency response information will be made accessible to people with disabilities.
- Work with the person requesting the information to figure out how to meet their needs, as soon as possible.
- Employees who have a disability will be provided emergency information in a format that meets their needs.

*Required legislative compliance: January 1, 2012*

*Completion date: January 1, 2012*

### Feedback Processes

The North West LHIN is committed to having an open feedback process where, when asked, will receive and respond to feedback in an accessible manner to employees and members of the public who have a disability. Feedback is welcomed as it encourages continuous service improvements.

#### *Planned Action:*

In accordance with the IASR, the North West LHIN will:

- Implement a Feedback process for all IASR requirements once implemented which provides various options for feedback such as email, mail, phone, online, in person).
- Promote feedback by advertising on their website as well as at reception.
- Develop an Accessible Format Request Form and have available on-line on the North West LHIN's internal website, for completion by LHIN staff upon receipt of a request from the public for such documentation in an accessible format. In addition, an internal referral process will be in place for fulfilling the accessible format request.

*Required legislative compliance: January 1, 2014*

*Implementation timeframe: September 1, 2013 to January 1, 2014*

*Completion date: N/A*

### Accessible format and communication supports

The North West LHIN will let the public know that information will be made accessible upon request and will work with them to figure out how to meet their needs, as soon as possible.

#### *Planned Action:*

In accordance with the IASR, the North West LHIN will:

- Make information accessible upon request

- When someone asks for accessible information, the North West LHIN will work with them to try to meet their needs. Either recreating a document in a different format or make information accessible by helping someone to use the original document or resource.
- Provide information as soon as possible
  - If unable to make the information accessible instantly, the North West LHIN will provide this as soon as possible, depending on the individual's needs, the format or our resources.
- Let the public know
  - The North West LHIN will inform the general public that they will make information accessible upon request. This notice will be posted on their website and at their reception desk.
- When accessible information is requested, the North West LHIN's Communications department will ensure their needs are met.

*Required legislative compliance: January 1, 2015*

*Implementation timeframe: January 1, 2013 to January 1, 2015*

*Completion date: N/A*

### Accessible Websites and Web Content

The North West LHIN will ensure websites and web content is accessible based on the IASR requirements.

#### *Planned Action:*

In accordance with the IASR, the North West LHIN will:

- Ensure development of its next generation digital platform for public websites, and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology.
- Use guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program standard, which specifies compliance with international accessibility guidelines, W3C WCAG 2.0.
- Follow the mandated Accessibility Directorate of Ontario (ADO) guidelines and Province of Ontario I&IT solutions that support obligated Private Sector and Broader Public Sector organizations in compliance initiatives.
- Partner with Corporate Communications and, in collaboration with operating divisions, provide guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats.

- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

### *Accomplishments to Date:*

- AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives.

### *Required Legislative Compliance:*

*January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content*

*January 1, 2021 – WCAG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR*

*Implementation timeframe: January 1, 2014 to December 31, 2017*

*Completion date: N/A*

## **Employment Standards**

### Recruitment

The North West LHIN is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

### *Planned Action:*

In accordance with the IASR, the North West LHIN will:

### *Recruitment General*

The North West LHIN will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes.
- Specifying that accommodation is available for applicants with disabilities, on the North West LHIN's website and on job postings.
- Working with suppliers to ensure external Web pages are compliant with the Information and Communication Standards under the IASR's requirements.

### *Recruitment, assessment and selection*



The North West LHIN 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 and processes.
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment.
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

### *Notice to Successful Applicants*

When making offers of employment, the North West LHIN will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes.
- Inclusion of notification of North West LHIN's policies on accommodating employees with disabilities in offer of employment letters.

*Required legislative compliance: January 1, 2014*

*Implementation timeframe: January 1, 2013 to January 1, 2014*

*Completion date: N/A*

### Informing employees of supports/accessible formats and communication supports

The North West LHIN will inform employees about their policies for supporting employees with disabilities including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

### *Planned Action:*

In accordance with the IASR, the North West LHIN will:

- Inform current employees and new hires of the North West LHIN's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability.
- Provide information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process.

- Keep employees up to date on changes to existing policies on job accommodations with respect to disability.
- Where an employee with a disability so requests it, the North West LHIN will provide or arrange for provision of suitable accessible formats and communications supports for:
  - Information that is needed in order to perform the employee's job.
  - Information that is generally available to employees in the workplace.
- In meeting the obligations to provide the information that is set out in the paragraph above, the North West LHIN will consult with the requesting employee in determining the suitability of an accessible format or communication support.

*Required legislative compliance: January 1, 2014*

*Implementation timeframe: January 1, 2013 to January 1, 2014*

*Completion date: N/A*

### Workplace Emergency Response Information

The North West LHIN is committed to keeping all employees safe while at work.

#### *Action Taken:*

The following measures were implemented by the North West LHIN effective January 1, 2012:

- If required, provide emergency response information in a format that meets the need of the disabled employee, as soon as possible.
- With their consent, share the emergency information with anyone designated to help them in an emergency. The details of the disability will not be shared, just what kind of help they need.
- Where an employee has disclosed a disability, individual accommodation plans and emergency plans will be created with the employee and communicated with management and health and safety representatives, on an 'as needed' basis.
- Where required, the North West LHIN will provide assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees.
- Workplace Emergency Response Information forms will be prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities.
- A form for voluntary disclosure will be given to all new hires for accommodation request and emergency response accommodation.
- Any other health and safety information will be provided in an accessible manner based on their disability.

- On an ongoing and regular basis, and as per the applicable terms of the IASR, the North West LHIN will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

*Required legislative compliance: January 1, 2012*

*Completion date: January 1, 2012*

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

The North West LHIN will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

#### *Planned Action:*

The North West LHIN's existing policies include steps to take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

The North West LHIN will review and assess the 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.

The North West LHIN will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan.
- Include in the process the means by which the employee is assessed on an individual basis.
- Include in the process the manner in which the North West LHIN can request an evaluation by an outside medical or other expert, at the North West LHIN's expense, to assist the North West LHIN in determining if and how accommodation can be achieved.
- Steps are in place to protect the privacy of the employee's personal information.
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done.
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied.
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs.
- If individual accommodation plans are established, ensure that they include:
  - Individualized workplace emergency response information that is required.

- Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
  - Information that is needed in order to perform the employee's job.
  - Information that is generally available to employees in the workplace.
- Identify any other accommodation that is to be provided to the employee.

The North West LHIN will ensure that the return to work process as set out in its existing policies outlines the steps the LHIN 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 legislative compliance: January 1, 2014*

*Implementation timeframe: January 1, 2013 to January 1, 2014*

*Completion date: N/A*

### Performance Management, Career Development and Redeployment

The North West LHIN 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:*

In accordance with the IASR, the North West LHIN will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR.
- Performance Management
  - Review employees' accommodation plans to understand their needs and see whether adjustments need to be made to help them succeed.
  - Make performance management documents available in accessible formats when asked.
  - Provide feedback and coaching in a way that is accessible to them.
- Career Development
  - When providing career development opportunities, consider what accommodations are needed to learn new skills or take on more responsibilities in their current position.

- Redeployment
  - Think about what can be done to help employees with disabilities succeed in other positions within the organization when they change jobs.

*Required legislative compliance: January 1, 2014*

*Implementation timeframe: January 1, 2013 to January 1, 2014*

*Completion date: N/A*

### **Barrier Identification and Removal**

The North West LHIN, along with the LHIN Accessibility Advisory Committee will continually assess current and future accessibility barriers and remove these barriers in a way that best addresses these issues, as soon as possible. Feedback, both internally and externally, from those with disabilities is welcomed and will be addressed in a timely matter. Any barriers within the building, outside of the North West LHIN control, will be communicated with the landlord to ensure they are adequately addressed.

### **For more information**

For more information on this accessibility plan, please contact **Dushan Zuber** at:

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Accessible formats of this document are available free upon request, by contacting the above.