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

December 29, 2023

Introduction

The <u>Accessibility for Ontarians with Disabilities Act, 2005</u> ("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.

Under AODA, Ontario businesses and organizations adhere to the <u>Integrated Accessibility Standards Regulation</u> (IASR) which outlines standards in these five areas: Information and Communication, Employment, Customer Service, Transportation and Design of Public Spaces.

The Central Local Health Integration Network (LHIN), operating as Home and Community Care Support Services Central (HCCSS), strives to meet the accessibility and accommodation requirements as prescribed in the AODA and IASR.

Home and Community Care Support Services Central's Statement of Commitment

Home and Community Care Support Services Central 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 Ontario's Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Home and Community Care Support Services Central 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 Home and Community Care Support Services Central'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, Home and Community Care Support Services Central 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, Home and Community Care Support Services Central will:

- Establish, review and update this plan in consultation with persons with disabilities,
- Post this plan on its website, www.healthcareathome.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.

Home and Community Care Support Services Central recognizes that much of the service we provide is delivered in individual client homes. We are committed to honouring the spirit and intent of the policy in all situations.

The following pages set out the specific deliverables that Home and Community Care Support Services Central has identified in its Accessibility Plan along with key dates.

Home and Community Care Support Services Central has reached compliance for the applicable standards required to date.

Part I – General Requirements

Accessibility policies (s.3)

Develop, implement, and maintain policies

Requirement/Standard: Develop, implement, and maintain policies re: accessibility in compliance with regulation. (s.3.1)

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

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

Accessibility Policies:

- Accessible Customer Service
- Accessible Employment
- Disability Accommodation

Additional Policies Addressing Accessibility:

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

Continuous Improvement Actions and Next Steps: Review of accessibility policies as part of status review. Routinely review website and intranet links.

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Include statement of commitment

Requirement/Standard: Include statement of commitment. (s.3.2)

Deadline and Status: January 1, 2014 Completed

Action Taken: Commitment Statement included in both Accessible Customer Service and Accessible Employment policies and the Multi-year Plan posted on the website and intranet.

Written documents, publicly available in accessible format

Requirement/Standard: Written documents, publicly available in accessible format. (s.3.3)

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

Action Taken: Website includes Accessibility Page containing:

- Accessible Customer Service and Accessible Employment policies
- Links to the Multi-Year Plan and Status Report, accessible formats available on request

Continuous Improvement Actions and Next Steps: Routinely review website and intranet links.

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 and on-going

Action Taken: 2017-2021 Accessibility Plan currently posted and available in accessible format on request. 2014-2018 Accessibility Plan initially posted.

Plans developed and reviewed in consultation with cross functional Advisory Group (representing Facilities, Communications, Occupational Health & Safety, Human Resources, Patient Services, Quality, Risk & Patient Safety, Information Technology) and persons with disabilities.

Multi-Year Accessibility Plan reviewed in 2023 and 2023 Annual Status Report posted; available in accessible format on request.

Continuous Improvement Actions and Next Steps: Continue to regularly review plan. Post status report annually.

Investigate expansion of Advisory Group to provincial/regional level, consulting with the new Manager, Equity, Inclusion, Diversity and Anti-Racism for continued accommodation and accessibility best practice sharing,

Procurement (s.5)

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

Deadline and Status: Completed and on-going

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

Training (s.7)

Introductory Training

Requirement/Standard: 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)

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

Action Taken: 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. Contractual provisions support training at service provider organizations.

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Ongoing Training

Requirement/Standard: Ongoing training re: policy changes. (s.7.4)

Deadline and Status: January 1, 2015 On-going

Action Taken: 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.

Provincial Accessible Formats and Information for Patients and Members of the Public Policy developed which reinforces the availability of accessible formats for patients and members of the public. Policy introduced via email and education provided to all staff and members of the Board of Directors.

Continuous Improvement Actions and Next Steps: Continue to explore opportunities to promote IASR, policies and support tools through additional avenues to reinforce training on an annual basis.

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Training Records

Requirement/Standard: Keep record of training provided. (s.7.5)

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

Action Taken: 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.

Feedback (s.11)

Requirement/Standard: 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)

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

Action Taken: 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.

Accessible formats and communications supports (s.12)

Requirement/Standard: Provide accessible formats and 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 and 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 and at no additional cost to the individual. Key documents and accessibility training materials are prepared in a conversion-ready format.

Provincial Accessible Formats and Information for Patients and Members of the Public Policy in place which reinforces the availability of accessible formats for patients and members of the public. Policy education provided to all staff and members of the Board of Directors.

Continuous Improvement Actions and Next Steps: Post new form to facilitate requests for accessible format and communication support.

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 and on-going

Action Taken: Emergency procedures, plans and safety information prepared for the public provided in accessible format/with appropriate communication supports as soon as practicable on request.

Fire and Evacuation Policy is available in accessible format on request.

Accessible websites and web content (s.14)

Requirement/Standard: 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)

Deadline and Status: January 1, 2014 - new websites, 2014-Completed and on-going, and January 1, 2021 all websites, 2021-Completed and on-going

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

Continuous Improvement Actions and Next Steps: Developed plan to achieve 2021 compliance (all internet websites and website content to conform with WCAG 2.0 Level AA (excluding live captioning/audio description).

Our website - http://healthcareathome.ca - is AODA compliant and conforms with WCAG 2.0 Level AA per Regulation 191/11.

Part III IASR - Employment Standard

Recruitment, general (s.22)

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

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

Action Taken: All external job postings contain notice that accommodations are available during the recruitment/selection process on request to Human Resources. Notice also identified in the Accessible Employment Policy posted on the website. Accommodation shall be provided in accordance with the Ontario Human Rights Code and AODA.

Recruitment, assessment or selection process (s.23)

Recruitment Accommodations

Requirement/Standard: Advise applicants invited to participate in assessment process that accommodation is available. (s.23.1)

Deadline and Status: January 1, 2016 Completed and 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.

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Suitable Accommodations

Requirement/Standard: Upon request, consult with applicant re: suitable accommodation. (s.23.2)

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

Action Taken: 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.

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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 and on-going

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

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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 and updates to be provided on on-going basis. (s.25.1, 25.2, 25.3)

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

Action Taken: Accessibility training is mandatory for staff. The Human Resources Presentation on day one of corporate orientation provides an overview of the policies. The eLearning module is assigned during corporate orientation for new hires. Employees will be notified and educated on significant changes to the accessibility policies.

Accessible formats for employees (s.26)

Requirement/Standard: 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)

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

Action Taken: New staff are asked to identify required supports/accessible formats on New Hire Package submitted to Human Resources. A Request for Accessible Format or Communication Support Form is also available for completion. 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 and 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. 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.

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

Continuous Improvement Actions and Next Steps: Review Emergency Response poster for locations and content given changes to on-site capacity and work station location.

Incorporate the Self-Assessment Checklist/Emergency Information Worksheet into onboarding and RTW processes.

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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 and on-going

Action Taken: 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.

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.29.1, 29.2, 29.3)

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

Action Taken: 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.

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Performance management (s.30)

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

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

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

Career development and advancement (s.31)

Requirement/Standard: Must take into account the accessibility needs and individual accommodation plans of employees. (s.31.1, 31.2)

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

Action Taken: Individual accommodation needs will be taken into 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.

Redeployment (s.32)

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

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

Action Taken: Should redeployment occur, the needs of employees with disabilities will be taken in to account.

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

Exterior Paths of Travel and Obtaining Services (s.80)

Requirement/Standard: 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)

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

Action Taken: Accessibility standards for the built environment were considered during planning/design of the Sheppard, Newmarket and Markham office spaces. Service counters have been designed at accessible heights, and waiting areas are accessible.

Continuous Improvement Actions and Next Steps: Incorporate related criteria in to provincial Office Inspection Checklists for the Joint Health and Safety Committee.

PART IV.2 Customer Service Standards

Policies (s. 80)

Accessible Customer Service

Requirement/Standard: 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)

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

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

Continuous Improvement Actions and Next Steps: On-site signage and visitor logs will be reviewed for enhanced communication options.

Temporary Disruptions

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 and on-going

Action Taken: Process identified in the Accessible Customer Service Policy. Subject to this requirement may include accessible parking, washrooms, elevators or power doors to public entrances. Notice may be posted on the public website, on premises of the event, or by other means reasonable to the circumstance.

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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 and on-going

Action Taken: Training is provided to all employees and those who provide services on HCCSS'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.

Developed new provincial role and hired a Manager, Equity, Inclusion, Diversity and Anti-Racism to further develop programs and policies and support education and awareness.

Feedback Process

Requirement/Standard: 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)

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

Action Taken: HCCSS 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).

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Accessible Format and Communication Support

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 and on-going

Action Taken: HCCSS 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.

For more information on this accessibility plan, please contact:

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