

LEEDS, GRENVILLE AND LANARK DISTRICT HEALTH UNIT	
<b>HEALTH UNIT ADMINISTRATION MANUAL</b>	
<b>Policy and Procedure</b>	
Title: <b>Accessibility for Ontarians with Disabilities Act (AODA)</b>	Original Date: September 11, 2013
Number:	Revision Date:
Approved by:	Reviewed Date:

**Purpose:**

This policy is intended to meet the requirements of the Accessibility for Ontarians with Disabilities Act (AODA). The Leeds, Grenville & Lanark District Health Unit (Health Unit) is committed to:

- Excellence in serving all clients, including people with disabilities.
- Meeting the accessibility and communication needs of persons with disabilities in a timely manner in accordance with the AODA and its Standards.
- Fair and accessible employment practices and accommodation of people with disabilities during the recruitment and assessment processes and when people are hired.

**Policy:**

General policy statements:

- The Health Unit will develop accessibility plans, policies and procedures to fully implement its responsibilities under the AODA and AODA Standards in support of the goal of making the province fully accessible by 2025. The plans will identify and address the following barriers to accessibility: physical, attitudinal, technological, organizational and informational.
- The Health Unit shall notify clients that the documents related to the Accessibility Standard for Customer Service (Policy and Plan) are available upon request and in a format that takes into account the client's disability.

Procuring or Acquiring Goods & Services or Facilities

- The Health Unit will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities.

The Provision of Goods and Services to Persons with Disabilities

- Health Unit employees will make every reasonable effort to ensure that their practices are consistent with the principles of dignity, independence, integration and equal opportunity by:
  - Ensuring that all clients receive the same value and quality.
  - Allowing clients with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk.
  - Using alternative methods when possible to ensure that clients with disabilities have access to the same services, in the same place and in a similar manner.
  - Taking into account individual needs when providing goods and services.
  - Communicating in a manner that takes into account the client's disability.

#### Notice of Disruptions in Service policy

- If there is a disruption in a particular facility or service used to allow a person with a disability to access goods or services, the Health Unit will give notice of the disruption to the public by posting the reason for the disruption, the anticipated duration of the disruption, and alternative facilities or services that may be available.

#### Assistive Devices policy

- Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the Health Unit.

#### Guide Dogs, Service Animals and Service Dogs policy

- A client with a disability that is accompanied by guide dog, service animal or service dog will be allowed access Health Unit offices and service sites.
- If a guide dog, service animal or service dog is excluded by law (*Dog Owners' Liability Act, Ontario*) the Health Unit will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).
- The client that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.
- If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, the Health Unit will make all reasonable efforts to meet the needs of all individuals.

#### Support Persons policy

- If a client with a disability is accompanied by a support person, Health Unit employees will ensure that both persons are allowed to enter the premises together and that the client is not prevented from having access to the support person. policy
- There may be times where seating and availability prevent the client and support person from sitting beside each other. In these situations the Health Unit will make every reasonable attempt to resolve the issue.
- In situations where confidential information might be discussed, consent will be obtained from the client, prior to any conversation where confidential information might be discussed. policy

#### Feedback Process policy

- The Health Unit shall provide clients with the opportunity to provide feedback on the service provided to clients with disabilities. Information about the feedback process will be readily available to all clients and notice of the process will be made available through the Health Unit's website. All feedback, including complaints, will be directed to management staff in the Quality, Information and Standards Department. Clients can expect to hear back in 5 days. Clients can submit feedback by email, phone or in-person at any office or service site.

#### Training policy

- The Health Unit will provide training about the provision of its goods and services to persons with disabilities, the Integrated Accessibility Standards and the Ontario Human Rights Code. All employees, volunteers, contractors and others who deal with the public or other third parties, and those involved in developing customer service policies, practices, and procedures, will receive Accessibility Awareness Training within six months of beginning their duties. The Health Unit will also provide ongoing training with respect to changes in its policies, practices, and procedures to those individuals who require such training as soon as practicable. This training will be coordinated by staff in the QIS Department.

#### Information and Communication policy

- The Health Unit will consult with people with disabilities to determine their information needs and any communication supports needed.
- The Health Unit will make all new websites and content on those sites conform to WCAG 2.0, Level A as per the AODA specified timelines (2020).

- The Health Unit will take the necessary steps to make sure all publicly available information is made accessible upon request in alternate formats as per the AODA specified timelines.

#### Employment policy

- The Health Unit will ensure the accessibility needs of employees with disabilities are taken into account during performance management, career development and redeployment processes.
- The Health Unit is committed to fair and accessible employment practices and will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.
- The Health Unit will ensure the development of individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.
- The Health Unit will provide employees with disabilities with individualized emergency response information when necessary (upon request).

**Scope:** This policy shall apply to all members of the Board of Health, employees, volunteers, and students. In addition, the Customer Service Standard applies to all other persons providing services on behalf of the Health Unit, such as contractors.

#### **Responsibilities:**

##### Medical Officer of Health

- Will serve as the AODA Compliance Officer.
- Ensure that this policy and any other policy having an impact on persons with disabilities are regularly reviewed.
- Will review and update the accessibility plans in consultation with persons with disabilities or an advisory committee.
- Oversee that annual status reports are prepared to report on the progress of steps taken to implement the Health Unit's accessibility plan and that they are posted on the Health Unit's website.

##### Human Resources Program Manager

- Will notify employees and the public about the availability of accommodation for job applicants who have disabilities.
- Oversee, provide and/or arrange for the provision of accessible formats and communication supports needed for an employee to perform their job.
- Develop and have in place written processes for documenting individual accommodation plans for employees with disabilities.

##### Business Manager

- Ensure property complies with AODA.

##### Director/Manager Quality, Information & Standards Department

- Oversee the provision of accessible formats and communication supports for public persons with disabilities in a timely manner at no additional cost to the individual.
- Oversee the feedback process documented on the Health Unit's website in which the public can provide feedback on the accessibility of the provision of goods and services by the Health Unit.

##### Managers/Directors

- Prepare/approve posting for disruptions in services

##### Staff Development Coordinator

- Coordinate/facilitate required AODA training for employees.

### Webmaster

- Ensure web content conforms to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA as per AODA timelines.

### All Staff

- Will ensure people with disabilities are welcomed and supported within the Health Unit

**Consequences:** By not complying with the AODA the Health Unit may be creating a barrier between the Health Unit's information and services and disabled persons trying to access those. As well, the Health Unit will be violating Provincial law and may be penalized.

### **Procedures:**

#### General Procedures

- The Health Unit shall notify clients that the documents related to the Accessibility Standard for Customer Service (Policy and Plan) are available upon request and in a format that takes into account the client's disability by posting the information on the Health Unit's website and/or any other reasonable method.
- The QIS department will review and update the accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee.
- The QIS department will prepare an annual status reports on the progress of steps taken to implement the Health Unit's accessibility plan and post it on the website.

#### Notice of Disruptions in Service procedure

Posting of disruptions in services will be prepared by the Program Manager and posted in a conspicuous place on the premises of the Health Unit, or by other reasonable methods in the circumstances. If the disruption is anticipated, the Health Unit will provide a reasonable amount of advance notice of the disruption. If the disruption is unexpected, notice will be provided as soon as possible.

#### Training Procedure:

Human Resources will keep records of the AODA training provided, including dates when training is provided and the number of persons trained.

As reflected in Ontario Regulation 429/07, regardless of the format, Accessibility Awareness Training will include the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
  - Use assistive devices.
  - Require the assistance of a guide dog, service dog or other service animal.
  - Require the use of a support person.
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- The Health Unit's policies, procedures and practices pertaining to providing accessible customer service to clients with disabilities.

#### Employment procedures

- Human Resources will put processes in place to determine the accessibility needs of employees with disabilities inform the management staff as appropriate and document/track that information.

- Management staff will incorporate this information into performance management practices.
- Human Resources shall inform applicants throughout the application, recruitment and interview process that the Health Unit will provide accommodations, upon request, for persons with disabilities.
- Human Resources will consult with the employee and any other appropriate persons and organizations to develop individual accommodation plans and return-to-work plans for employees that have been absent due to a disability. The following specific elements will be included:
  - The ways in which the employee can participate in the development of the plan.
  - The means by which the employee is assessed on an individual basis.
  - The ways an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved.
  - The steps taken to protect the privacy of the employee's personal information.
  - The frequency with which the individual accommodation plan should be reviewed or updated, and the process outlining how it should be done.
  - The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

### **Definitions:**

#### Assistive Devices

Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (i.e. canes, crutches, wheelchairs, or hearing aids).

#### Accessible Formats/Communication Supports

Include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

#### Disabilities

As per the Ontario *Human Rights Code*, "disability" means:

- a. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b. a condition of mental impairment or a developmental disability,
- c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d. a mental disorder, or
- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; ("handicap").

#### Information

Includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

#### Performance Management

Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

#### Persons with Disabilities

Individuals who are afflicted with a disability as defined under the *Ontario Human Rights Code*.

#### Redeployment

The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

Service Animals

Any animal individually trained to do work or perform tasks for the benefit of a person with a disability.

Support Person

In relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs, or with access to goods, services or facilities.

**Related Internal References:**

- Multi-year accessibility plan.
- Employment hiring process.
- Individual accommodation plans for employees with disabilities process.
- Performance management, career development and redeployment processes.
- Return-to-work policies for employees that have been absent due to a disability.

**Related External References:** <http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/>

**Revision History:**

Revision	Date	Description of changes	Requested By