

North Lambton Community Health Centre Accessibility Plan

By January 1, 2014

GENERAL REQUIREMENTS

Establishment of Accessibility Policies

- 3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the Regulation.

Client Policy #22 "Providing Customer Service to People with Disabilities"

- 3.(2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.

Client Policy #22 "Providing Customer Service to People with Disabilities" states

2.0 Our Commitment

In fulfilling our mission, the North Lambton Community Health Centre strives at all times to provide its services in a way that respects the dignity and independence of people with disabilities. The North Lambton CHC is also committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services, in the same place and in a similar way as other clients.

Accessibility Plans

- 4.(1) The Government of Ontario, Legislative Assembly, designated public sector organizations and large organizations shall,
- (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;

Create this document and revise existing "Making NLCHC Sites Accessible" document created August 2011 to reflect all aspects of accessibility rather than just capital equipment and improvements.

- (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and

Updated Accessibility Plan to be posted on NLCHC website as well as be printed out as a complete document for distribution when requested.

- (c) review and update the accessibility plan at least once every five years.

Add review of Accessibility Plan every five years to NLCHC's existing Policy Review Schedule.

Self-Service Kiosks

- 6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

By definition of “kiosk,” the North Lambton Community Health Centre does not have any interactive electronic terminals, including point-of-sale devices, intended for public use that allows users to access one or more services or products or both.

INFORMATION & COMMUNICATION STANDARD

Accessible Websites & Web Content

- 14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.

Contact web designer to determine if the NLCHC website was designed per the WCAG 2.0 guidelines. If not, employ web designer to update website to Level A required. Receive statement from web designer indicating website meets WCAG 2.0 Guidelines at Level A.

By January 1, 2015

GENERAL REQUIREMENTS

Training

- 7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and on the *Human Rights Code* as it pertains to persons with disabilities to,
- (a) all employees and volunteers;
 - (b) all persons who participate in developing the organization’s policies; and
 - (c) all other persons who provide goods, services or facilities on behalf of the organization.

Update power point presentation used to teach staff “Accessible Customer Service Standards” to include General Requirements, Information & Communication Standards, and Employment Standards. Present updated presentation to staff and volunteers at a regularly scheduled meeting.

Update current “Accessible Customer Service Guide” training booklet for new employees and volunteers to reflect remaining aspects of the AODA. Use updated training booklet for all new incoming staff and volunteers.

- 7.(2) The training on the requirements of the accessibility standards and on the *Human Rights Code* referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers, and other persons.

Research and determine what is “appropriate to the duties of CHC employees, volunteers, and other persons per the *Human Rights Code*. Incorporate identified training items into training materials.

- 7.(3) Every person referred to in subsection (1) shall be trained as soon as practicable.
 Use forum of monthly staff meetings and distribution of hard copies to current staff and volunteers. Use orientation process for new employees and volunteers.
- 7.(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.
 Maintain annual review of CHC policies by all staff. Per current practice, bring all changes to policies to staff via monthly staff meetings.
- 7.(5) The Government of Ontario, the Legislative Assembly, every designated public sector organization and every large organization shall keep a record of the training provided under this section, including dates on which the training is provided and the number of individuals to whom it is provided.
 Maintain current CHC training database for recording all training and applicable dates.

INFORMATION & COMMUNICATION STANDARD

Feedback

- 11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.
 Monitor current feedback processes – Client Feedback brochures, CHC Stars.
 Review and update current client complaint policy and associated forms.
 Continue education of feedback methods to new CHC clients through the Meet & Greet process.
 Continue to use and monitor use of NLCHC email contact information provided on website.
 Continue accessibility questions on annual client surveys and program participant surveys. Act upon accessibility recommendations derived from survey responses.
- 11.(2) Nothing in this section detracts from the obligations imposed under section 7 of Ontario Regulation 429/07 (Accessibility Standards for Customer Service) made under the Act.
 Continue use of “Client Feedback” brochures previously updated to meet Accessible Customer Service Standards.
- 11.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.
 Create list of accessible formats and communication supports available for use at the CHC. Provide this list as part of current Meet & Greet process, in all waiting rooms, and on website.



By January 1, 2016

INFORMATION & COMMUNICATION STANDARD

Accessible Formats & Communication Supports

- 12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,
- (a) in a timely manner that takes into account the person's accessibility needs due to disability; and
 - (b) at a cost that is no more than the regular cost charged to other persons.

When needed, access community partners for assistance in providing accessible formats and communications supports not already in place at the CHC.

All programs of the CHC are free of charge to participants, clients, and any support persons attending a person who has disabilities.

- 12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.

Commitment to support all CHC clients and program participants is stated in current policies and is an integral part of the CHC model of care.

Health care providers consult with clients every visit and will assist when a need for accessible format or communication support is identified.

All other staff and volunteers are trained to respond to and/or report all needs arising from program participants to ensure full participation.

- 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.

Create list of accessible formats and communication supports available for use at the CHC. Provide this list as part of current Meet & Greet process, in all waiting rooms, and on website.

- 12.(4) Every obligated organization that is required to provide accessible formats or accessible formats and communication supports by section 3,4,11,13,19,26,28,34,37, 44, or 64 shall meet the requirements of subsection (1) and (2) but shall do so in accordance with the schedule set out in the references section and shall do so only to the extent that the requirements in the subsections (1) and (2) are applicable to the requirements set out in the referenced section.

Maintain this accessibility plan through annual review by NLCHC Management Team.

EMPLOYMENT STANDARD

Informing Employees of Supports

- 25.(1) Every employer shall inform its employees of its policies used to support its 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 disability.

Opportunity during orientation of new employees for employee to identify any accommodations for disabilities needed.

OHS Policy 3.2 Workplace Accommodation – OHS Policies reviewed by all employees annually. Includes annual update to identify any accommodations needed by employee

HR Policy 8.15 Workplace Accommodation on the Basis of Disability – HR Policies reviewed by all employees annually.

- 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.

Opportunity during orientation of new employees for employee to identify any accommodations for disabilities needed.

New employee orientation includes reading of all NLCHC policies.

- 25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

Update current OHS Policy 3.2 Workplace Accommodation to include accommodation for employees with disabilities, not just return to work after workplace injury.

Update current HR Policy 8.15 Workplace Accommodation on the Basis of Disability to include all aspects of disability per current standards.

Maintain annual review of CHC policies by all staff. Per current practice, bring all changes to policies to staff via monthly staff meetings.

Documented Individual Accommodation Plans

- 28.(1) 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.

Currently have HR Policy 8.16 Attachments:

A – Early and Safe Return to Work

B – Sample Physician Request Letter

C – Physical Demands Analysis

- 28.(2) 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 assist the employer in determining if accommodation can be achieved and, if so, 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 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.

Review and updated all HR Policies & Forms discussing the subject of workplace accommodation to include all types of disabilities that any employee may need accommodations for – above and beyond returning to work after a workplace injury.

- 28.(3) 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.

Review and updated all HR Policies & Forms discussing the subject of workplace accommodation to include all types of disabilities that any employee may need accommodations for – above and beyond returning to work after a workplace injury.

Return to Work Process

- 29.(1) Every employer, other than the employer that is a small organization,
- (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order the return to work; and
 - (b) shall document the process.

Review and updated all HR Policies & Forms discussing the subject of workplace accommodation to include all types of disabilities that any employee may need accommodations for – above and beyond returning to work after a workplace injury.

- 29.(2) The return to work process shall,
- (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and

(b) use documented individual accommodation plans, as described in section 28, as part of the process.

Review and updated all HR Policies & Forms discussing the subject of workplace accommodation to include all types of disabilities that any employee may need accommodations for – above and beyond returning to work after a workplace injury.

29.(3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.

Performance Management

30.(1) An employer that uses performance management in respect of its employees shall 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.

Review and update all HR Policies & Forms discussing performance management to include the opportunity for consideration of an employee's need for accommodation based on a disability.

- HR Policy 5.0 Probation
- HR Policy 9.0 Performance Evaluation Appraisal
- HR Appendix E Staff Annual Performance Review & Goal Setting

Career Development and Advancement

31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.

Review and update all HR Policies & Forms discussing staff training and development to include the opportunity for consideration of an employee's need for accommodation based on a disability.

- HR Policy 15.0 Staff Training and Development

Redeployment

32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

Review and update all HR Policies & Forms discussing secondment to include the opportunity for consideration of an employee's need for accommodation based on a disability.

- HR Policy 13.0 Secondment



By January 1, 2021

INFORMATION & COMMUNICATION STANDARD

Accessible Websites & Web Content

- 14.(4) Designated public sector organizations and large organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:
 2. by January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA.

Contact web designer to have NLCHC website upgraded to conform with WCAG 2.0 Level AA.

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