 Ontario North West Local Health Integration Network Réseau local d'intégration des services de santé du Nord-Ouest	Manual:	Operations		
	Section:	Human Resources	Number:	HR-304
	Sub-Section:	Workplace Practices	Approved:	November 23, 2017
	Document Owner:	Chief Executive Officer	Reviewed:	
			Revised:	
			Pages:	4
Title:	Accessibility for Ontarians with Disabilities			

PURPOSE:

The LHIN is required to meet obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). The purpose of the Act is to develop, implement and enforce accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

This policy is intended to meet the requirements of the Customer Service Standard, the Information and Communications Standard, the Employment Standard, and components of the Design of Public Spaces Standard, included in the Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005*.

SCOPE:

This policy applies to all employees in all employment categories, full-time regular, part-time regular, contract, student and intern, board members, volunteers, visitors to the LHIN offices, service providers and others providing services on behalf of the LHIN, and all individuals attending LHIN organized events.


POLICY:

The LHIN is committed to treating all people in a way that allows them to maintain their dignity and independence along with inclusion and equal opportunity. The 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.


PROCEDURE:

Many of the situations employees will encounter when delivering goods and services will be specific to the individual and the goods/services sought. The following procedures, along with LHIN policies, templates, guidelines, and resources, will assist LHIN employees to provide goods and services consistent with LHIN policy.

1. When communicating with a person with a disability, the LHIN will do so in a manner that takes into account the person's disability.
2. A person with a disability may provide his/her own assistive device for the purposes of obtaining, using and benefiting from the LHIN's goods and services that are made available to the public.
3. The LHIN welcomes people with disabilities who are accompanied by a service animal on the parts of our premises open to the public. If a service animal is excluded by law from the LHIN premises or poses a health and safety risk, the LHIN will ensure that alternative means are available to enable the person with a disability to access the LHIN's goods and services.
 - a. If the animal cannot be easily identified as a service animal, the LHIN can request documentation from a regulated health professional. The documentation must confirm that the person needs the service animal for reasons related to their disability.
4. The LHIN is committed to welcoming people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his/her support person while on our premises.

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- a. In situations where confidential information might be discussed, consent will be obtained, prior to any conversation where confidential information might be discussed.
- b. If regarding confidentiality of a client, the LHIN must obtain consent of the client and may require the support person to sign a confidentiality agreement. The client's confidential information will be subject to the Personal Health Information Protection Act (PHIPA)
- c. Where the LHIN requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, the LHIN will not charge the support persons any fees or fares.
5. In certain cases, the LHIN might require a person with a disability to be accompanied by a support person for health and safety reasons. Before making a decision, the LHIN will:
 - a. Consult with the person with a disability to understand their needs
 - b. Consider health and safety reasons based on available evidence
 - c. Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.
6. The LHIN will meet the Accessibility Standards for the Design of Public Spaces when building new public spaces, or making planned significant alterations to existing public spaces. Public spaces including:
 - a. Service-related elements like waiting areas, service counters and queuing guides
 - b. Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps and rest areas
 - c. Accessible off-street parking
 - d. Maintenance planning for the accessible parts of the public spaces
7. The LHIN will make reasonable efforts to provide notice in the event of a planned or unexpected disruption in the facilities or services where they have control over such facilities or services. This notice will include information about the reasons for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.
8. The LHIN will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not feasible to do so.
9. When requested, the LHIN will provide information and communications in an accessible manner to people with disabilities (both internally and externally) in a timely manner and in the most appropriate accessible format or communication support depending on the accessibility need of the person and the capability of the LHIN. The LHIN will work directly with the individual to determine the most appropriate options.
10. Information contained on the LHIN website will meet accessibility guidelines.
11. The LHIN is committed to working with employees with disabilities, who require assistance in an event of an emergency, to develop individual emergency response plans that take into account their disability.
12. The LHIN will accommodate employees with disabilities and create individual accommodation plans, as required, and consider accommodation needs in performance management, career

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development and redeployment.

- The LHIN will have an accessible recruitment process and will ensure accessible employment practices.

Training for Staff

The LHIN will provide training to 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 relevant policies, practices and procedures. Training will be provided as soon as practicable after an individual assumes responsibilities related to the public and will include the following:

- the purposes of the AODA and the requirements of The Integrated Accessibility Standards Regulation (IASR);
- the Ontario Human Rights Code as it relates to people with disabilities;
- information regarding the LHIN policies, practices and procedures relating to the IASR;
- how to interact, communicate and accommodate with people with various types of disabilities;
- what to do if a person with a particular type of disability is having difficulty accessing your goods or services;
- how to interact with people with disabilities who use an assistive device, service animal or support person;
- how to use the equipment or assistive devices that may be available at the LHINs;
- educational materials to employees on creating accessible documents; and
- job specific training to those positions needing tailored training for their roles i.e. management positions, communication and community engagement positions, procurement specialist, and reception.


The amount and format of training will be tailored to suit each person's interactions with the public or his/her involvement in the development of policies, procedures and practices pertaining to the provision of goods and services. Employees will also be trained on an ongoing basis as continuous education/development and when changes are made to these policies, procedures and practices.

Feedback Process

Feedback is welcomed as it encourages continuous service improvements. Feedback from a member of the public, including clients, about the delivery of goods and services to persons with disabilities may be given by telephone, in person, in writing, in electronic format or through other methods. Feedback internally from employees is always encouraged and can be provided by contacting Human Resources, their manager, or the Corporate Communications or Community Engagement department.

Barrier Identification and Removal

The LHIN 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 LHIN control, will be communicated with the landlord to ensure they are adequately addressed.

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Accessibility Plan

The LHIN has created a multi-year accessibility plan and will review at least every 5 years to ensure that the LHIN removes accessibility barriers and creates a more accessible work environment for employees and the public. This plan is posted on the LHIN website and is provided in an accessible format upon request.

REFERENCES:

The Accessibility for Ontarians Disability Act, 2005 (AODA)

Integrated Accessibility Standards

North West LHIN Multi-year Accessibility Plan

LHIN Best Practices in Support of the Accessibility Standards for Customer Service.

Ontario Human Rights Code: Disability and Human Rights

LHIN Policy Manual, HR, Recruitment

LHIN Policy Manual, HR, Staff Orientation

LHIN Policy Manual, HR, Performance Development

LHIN Policy Manual, HR, Return to Work

LHIN Policy Manual, HR, Training and Development

LHIN Policy Manual, FIN, Procurement

LHIN Policy Manual, OP, Communications

LHIN Guidelines:

- **Use of Service Animals by Persons with Disabilities**
- **Use of Support Persons by Persons with Disabilities**
- **Notice of Temporary Disruptions in Services and Facilities**
- **Feedback and Complaints**
- **Provision of Goods, Services and Facilities including the Use of Assistive Devices**
- *Accessibility for Ontarians with Disabilities Act (AODA) 2005: Accessible Formats and Communication Supports*
- *Training*
- *Feedback Process*
- *Accessible Employment*
- *Accessibility for Ontarians with Disabilities Act (AODA) 2005: Workplace Emergency Response Information for Employees*
- *Public Spaces*