

Policy Title	Accessibility for Employees with Disabilities		
Policy Type	Organizational		
Department	Human Resources		
Division	Accessibility		
Policy Number	HR-501		
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Approved by	VP, Human Resources and Corporate Administration	Next Review Date	June 30, 2021

1. Introduction

The Toronto Central LHIN will ensure that all employees and clients with disabilities receive goods and services respecting the dignity and independence of persons with disabilities, and meeting the unique needs of the individual. Agents and others providing goods and services on behalf of Toronto Central LHIN will adhere to these policies, standards, guidelines and procedures.

2. Purpose/Scope

The purpose of this policy is to ensure that the Toronto Central LHIN complies with the *Accessibility for Ontarians with Disability Act, 2005*. (AODA). The purpose of AODA is to develop, implement and enforce standards for accessibility related to goods, services, facilities, employment, accommodation and buildings. Its aim is to achieve accessibility for Ontarians with disabilities by 2025.

This policy applies to all Toronto Central LHIN employees, Clients, Board Members, contractors, suppliers and visitors.

4. Policy

4.1 Principles

The Toronto Central LHIN is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by identifying, preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005.

The provision of Toronto Central LHIN's services to persons with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person with a disability to obtain, use or benefit from the services.

4.2 Standards

These standards have been established for the purpose of fulfilling the requirements of the Accessibility Standards for Customer Service, (Ontario Regulation, 429/07). The Toronto Central LHIN will support employees and clients by taking reasonable measures in the following areas:

Communication

Toronto Central LHIN will communicate with employees/clients with disabilities in a manner that takes into account the person's disability and will make reasonable efforts to have the person understand both the content and intent of its communications.

Use of Assistive Devices

The Toronto Central LHIN supports employees/clients making use of any assistive device to obtain, use or benefit from the facilities and services it provides.

- The organization will take reasonable measures to provide devices and/or supports to enable them to access facilities and services. Where staff are aware of a client's need for assistance in accessing goods and services, staff will inform persons with disabilities of the accommodations and/ or the assistive devices the Toronto Central LHIN makes available to clients with disabilities.
- Persons who require the use of an assistive device will be permitted to keep their device with them unless the health and safety of the person or others is at risk or where there is a risk of damage to any person or property.
- Persons using assistive devices are required to be sensitive to the needs of others when utilizing their device (e.g. not blocking doors, hallways, access to public areas by others) and are expected to operate the device in a controlled manner at all times.
- If the device cannot stay with the person or if the person is not permitted to use the device the Toronto Central LHIN will make certain that other means of accommodation are available to the person.
- In the event that an employee disagrees about the use of assistive devices or accommodation decisions, they should contact their Manager or HR/OD Director. For client complaints, staff will follow the applicable feedback and complaints process for client services.

Use of Service Animals

The Toronto Central LHIN is committed to welcoming employees/clients with disabilities who are accompanied by a service animal. Service animals are allowed in areas of our office that are open to the public.

Employees/Clients with a disability may enter premises accompanied by a service animal and keep the animal with them, wherever the public has access to and if the animal is not excluded by law.

- Service animals may be identified by any one of the following methods:
 - The animal may be wearing a service animal vest, harness or saddle packs
 - The animal may be observed providing assistance
 - The person may have a letter from a physician or nurse stating that they require the animal for reasons related to a disability
 - The person may show a valid identification card or training certificate from a recognized service animal training school.
- It is the responsibility of the person to ensure that :
 - Their service animal is kept in control at all times and is well behaved
 - The service animal is not a threat to health and safety
 - The service animal's immunizations are up-to-date
- If these responsibilities are not upheld, the service animal may be removed and alternate arrangements will be made to support the person with the disability in the animal's absence.
- Every effort will be made to accommodate and ensure that the surroundings will allow the person to effectively maintain their relationship with the animal.

- In situations where there are individuals who have a pathological fear or severe allergy to particular animals, every effort will be made to accommodate the animal. However, if the animal must be segregated, alternate arrangements will be made to support the person in the animal's absence.

Use of Support Persons

The Toronto Central LHIN is committed to welcoming employees/clients with disabilities to any part of the organization who are accompanied by a support person.

- If a person with a disability is accompanied by a support person, Toronto Central LHIN shall ensure that both persons are permitted to enter the premises together and that the client with a disability is not prevented from having access to their support person while on the premises.
- Even though Toronto Central LHIN typically do not charge fees in relation to a support person's presence on the LHIN premises, the LHIN will provide advanced notice in the event a fee is ever charged. Fees will be posted where information is provided to the public
- It is necessary to seek the consent of the person before discussing confidential personal health information in the presence of the support person. If the support person is required to wait in a separate area while a person's confidential matters are addressed, accommodations will be made to support the client in the support person's absence.

4.3 Notice of Temporary Disruption of Service and facilities

The Toronto Central LHIN will make every effort possible to provide notice of any planned or unexpected temporary disruption to supports, services and facilities used by employees/clients with disabilities. Notices of disruption will be posted conspicuously in:

- The lobby of the office buildings (where applicable)
- Reception
- Toronto Central LHIN website

4.4 Training

All Toronto Central LHIN employees and Board members will receive training on the following:

- Requirements for the Accessibility Standards for Customer Service
- Requirements of the Integrated Accessibility Standards Regulation (IASR)
- Aspects of the Human Rights Code that relates to accessibility
- Toronto Central LHIN's policies, practices and procedures relating to the provision of goods and services to the public and other third parties.

5. Roles and Responsibility

Responsibility	Action
Employee	Provide information to your manager on any accommodation needed to perform your job duties. Ensure you understand the policies and procedures, and provide clients and others with accommodation, as required by them.
Manager	Ensure your employees complete AODA training and understand on-the-job requirements of these policies.

Responsibility	Action
	Answer questions and support to employees on any accommodation needs, as required.
Communications Department	Ensure that all documentation pertaining to compliance with the Accessibility Standards for Customer Services is posted on the website, and copies made available upon request and in a format taking into consideration the employee/client's disabilities.
HR Director	<p>Ensure AODA policies are followed and support managers and employees in determining and implementation accommodation solutions. Handle any employee accommodation complaints.</p> <p>Post AODA notices throughout the office(s) as appropriate</p> <p>Provide training to all employees and others, as appropriate on this policy and procedures. Ensure all employees, students and Board members receive training as part of their LHIN orientation. Provide refresher sessions as appropriate</p> <p>Maintain records on numbers trained and dates of training.</p>

6. Definitions

Barrier: Anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or practice.

Disability: Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness; a condition of mental impairment or a developmental disability; a learning disability or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language; a mental disorder; an injury or disability for which benefits were claimed or received under the Workplace Safety and Insurance Act, 1997

Service Animal: An animal acting as a service animal for a person with a disability (includes guide dogs who are trained as a guide for a blind person and have qualifications prescribed by the regulations (Blind Persons' Rights Act 1990 s! (1). Service animals may be identified as such:

- a. If it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- b. If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability.

Support Person: Another person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

7. References

Ontario Human Rights Code

Personal Health Information Protection Act (PHIPA).

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

Accessibility Standards for Customer Service, Ontario Regulation (O.Reg.) 429/07

8. Review/Revision History

Reviewed by (title)	Consulted With (title)	Modification(s)	Date
VP, Human Resources and Corporate Administration	Director, HR	Reviewed and Updated	November 2018