

## HOME AND COMMUNITY CARE SUPPORT SERVICES SOUTH WEST ACCESSIBILITY FOR ONTARIANS DISABILITY ACT (AODA 2005) ACCESSIBILITY STATEMENT OF COMMITMENT AND MULTI-YEAR ACCESSIBILITY PLAN

### ACCESSIBILITY INTRODUCTION AND STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (IASR) under the AODA require that effective January 1, 2013, the South West Local Health Integration Network operating as Home and Community Care Support Services South West (HCCSS SW) establishes, implements, maintains and documents a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

#### **Principles:**

Under the AODA, the following accessibility standards set certain requirements that are applicable to the organization:

- Customer Service;
- Information and Communications;
- Employment; and
- Proposed Accessibility Standards for the Built Environment

This multi-year plan outlines HCCSS SW's strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill HCCSS SW's commitment as outlined in HCCSS SW's Accessibility policy.

In accordance with the requirements set out in the IASR, HCCSS SW will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Post this plan on its website here;
- Report as required on its website on the progress 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 years.

## HOME AND COMMUNITY CARE SUPPORT SERVICES SOUTH WEST MULTI-YEAR ACCESSIBILITY PLAN

AODA Required Legislative Compliance Years	AODA General Requirements	AODA Information & Communications	AODA Employment Standard	HCCSS SW Completed Dates
January 1, 2010	<ul style="list-style-type: none"> <li>▪ Compliance with the Accessible Customer Service Regulation and subsequent Integrated Accessibility Standards under the AODA</li> </ul>			January 1, 2010
January 1, 2012		<ul style="list-style-type: none"> <li>▪ Integrated Accessibility Standards Regulations (IASR) Emergency procedure, plans or public safety information</li> <li>▪ Workplace emergency response information</li> </ul>		January 1, 2012
January 1, 2013	<ul style="list-style-type: none"> <li>▪ Accessibility policies s.3</li> <li>▪ Accessibility plans s.4</li> <li>▪ Procurement or acquiring goods, services or facilities s.5</li> </ul>			January 1, 2013
January 1, 2014	<ul style="list-style-type: none"> <li>▪ Training s.7</li> </ul>	<ul style="list-style-type: none"> <li>▪ Feedback processes s.11</li> <li>▪ All new internet websites and web content on those sites must conform with WCAG 2.0 level A s.14</li> </ul>	<ul style="list-style-type: none"> <li>▪ Recruitment s.22-24</li> <li>▪ Informing employees of supports s.25</li> <li>▪ Accessible formats and communication supports for employees s. 26</li> <li>▪ Employee accommodation s.25, 26, 28</li> <li>▪ Employees returning to work s.29</li> <li>▪ Performance management, career development and redeployment s.30-32</li> </ul>	January 1, 2014
January 1, 2015		<ul style="list-style-type: none"> <li>▪ Accessible format and communication supports s.12</li> </ul>		January 1, 2015
January 1, 2021		<ul style="list-style-type: none"> <li>▪ All internet websites and web content must conform with WCAG 2.0 level AA (excluding live captioning and audio description) s.14</li> </ul>		January 1, 2021

**Please note: The above indicates the sections of each AODA\* compliance requirements and it is identified by Section (s) then the Number (#).**

Please refer to [ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 - O. Reg. 191-11](#) for further details

**JANUARY 1, 2010**

**ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE**

**Commitments:**

We commit to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility.

**Measures implemented by HCCSS SW effective January 1, 2010 are as follows:**

**Communications:**

When communicating with a person with a disability, individuals working on behalf of the HCCSS SW will do so in a manner that takes into account the person's disability and makes reasonable efforts to have the person with a disability understand both the content and intent of its communications.

**Use of Assistive Devices:**

The HCCSS SW is committed to serving persons with disabilities who use assistive devices to obtain, to use, or to benefit from our goods and services. The HCCSS SW trains staff members on or about the assistive devices made available by the HCCSS SW and realize that persons with disabilities may use their own assistive devices to access HCCSS SW goods and services.

**Use of Service Animals:**

The HCCSS SW is committed to welcoming persons with disabilities and their service animals at our various sites that are open to the public and other third parties, and welcomes the person to keep the service animal with them. The HCCSS SW provides training on how to interact with persons with disabilities whom a service animal accompanies, to all people whom this policy applies. If the law excludes the service animal from HCCSS SW sites, we will facilitate other means by which persons with disabilities can access HCCSS SW goods and services.

**Use of Support Persons:**

The HCCSS SW is committed to welcoming people with disabilities accompanied by a support person. Any person with a disability accompanied by a support person is welcome to HCCSS SW sites with his or her support person. On occasion persons with disabilities require the assistance of a support person to protect their health and safety or the health and safety of others. If necessary, for protecting the health and safety of the person with the disability or others on the site, the HCCSS SW may require a support person to accompany a person with a disability.

**Notice of Temporary Disruptions in Services and Facilities:**

If there is a temporary disruption in HCCSS SW services that are utilized by persons with disabilities, completely or in part, the HCCSS SW gives the public notice of the disruption.

**Availability of the Accessible Customer Service Documents:**

The HCCSS SW prepares any additional documents describing its policies, practices, and procedures as required by Ontario Regulation 429/07 and, upon request, gives a copy of the documents to any person. Further, the HCCSS SW makes reasonable efforts to inform persons to whom it provides goods and services that the documents required under Ontario Regulation 429/07 are available upon request.

**Required legislative compliance: January 1, 2010**

**Completion date: January 1, 2010**

**JANUARY 1, 2012**

## **INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION**

### **Commitment:**

HCCSS SW is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities

### **Measures implemented by HCCSS SW effective January 1, 2012 are as follows:**

- Emergency procedures, plans and public safety information that are prepared by HCCSS SW and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;
- An Accessible Format Request Form was developed and is available on-line on HCCSS SW's internal website, for completion by HCCSS SW staff upon receipt of a request from the public for such documentation in an accessible form

### **Public Spaces:**

The HCCSS SW will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces, where applicable, may include:

- Service-related elements like waiting areas
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals/signage
- Accessible off street parking and accessible parking at HCCSS SW sites/offices
- Outdoor public eating areas

## **WORKPLACE EMERGENCY RESPONSE INFORMATION**

### **Commitment:**

Where HCCSS, SW is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### **Measures implemented by HCCSS SW effective January 1, 2012 are as follows:**

- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- Where required, HCCSS SW provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster.
- These plans for providing assistance have been set out in individualized emergency plans for the employees;
- These individualized emergency plans have been communicated to the employees' respective managers and Safety personnel, on an 'as needed' basis;
- On an ongoing and regular basis, and as per the applicable terms of the IASR, HHCCSS SW will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed

**Required legislative compliances: January 1, 2012**

**Completion dates: January 1, 2012**

## **JANUARY 1, 2013**

### **ACCESSIBILITY POLICIES**

#### **Commitment:**

The HCCSS SW is committed to develop, implement and maintain policies about what our organization will do to meet the IASR\* requirements and become more accessible.

#### **Measures implemented by HCCSS SW effective January 1, 2013 are as follows:**

- A Statement of Commitment to establish our vision and goals for accessibility.
- An Information and Communications Standards Policy.
- An Employment Standards Policy.
- Policies and statement posted on website, internally for employees, and available by request.
- Policies reviewed annually to ensure they are up-to-date and accurately reflect our organization and its practices.

### **ACCESSIBILITY PLANS**

#### **Commitment:**

The HCCSS SW is committed to outline the steps under the accessibility plan in order to comply with Ontario's accessibility laws and prevent and remove accessibility barriers.

#### **Measures implemented by HCCSS SW effective January 1, 2013 are as follows:**

Steps taken to comply with Ontario's accessibility laws and prevent and remove accessibility barriers were completed by;

- Setting out how we will meet accessibility requirements under the IASR on time (timeline)
- Addressing any current barriers to accessibility
- Preventing and removing future barriers
- Posting the multi-year plan on our website, available upon request, and in an accessible format when asked.
- Reviewing and updating our plan every 5 years. When plan is updated, the accomplishments will be highlighted
- Preparing updates on what have been done to achieve our accessibility plan as required. This update will be posted on our website, available upon request and in an accessible format when requested.

### **PROCUREMENT OR ACQUIRING GOODS, SERVICES OR FACILITIES**

#### **Commitment:**

The HCCSS SW will incorporate accessibility when procuring goods, services and facilities where possible.

- Make accessibility design and features part of our criteria for procurement, where possible.
- Accessibility criteria, technical features and structural features will be taken into consideration.
- If we can't incorporate accessibility into our purchase, when asked, we will:
  - Explain why we did not obtain assessable goods, services or facilities, and
  - Provide the explanation in an accessible format.

#### **Measures implemented by HCCSS SW effective January 1, 2013 are as follows:**

The HCCSS SW makes every reasonable effort to ensure that its policies, standard operating procedures and practices pertaining to the provision of goods and services to the public and other third parties, align with the following guiding principles:

1. The provision of the goods or services is in a manner that respects the dignity and independence of persons with disabilities.
2. Integration of the provision of goods or services to persons with disabilities and others unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
3. Giving persons with disabilities an opportunity equal to that given to others to obtain, to use, and to benefit from the goods or services

The HCCSS SW also provides training to those who are involved in the development and approvals of policies, procedures and practices that deal with the provision of goods and services to the public or third parties.

**Required legislative compliances: January 1, 2013**

**Completion dates: January 1, 2013**

## **JANUARY 1, 2014**

### **TRAINING**

#### **Commitment:**

The HCCSS SW will train its employees and volunteers on the Integrated Accessibility Standards Regulation.

- Training on the IASR requirements that apply to the HCCSS SW and the Ontario Human Rights Code (related to disabilities).
- For all current employees, a training program will be delivered through training sessions.
- For all future employees, training will be part of their orientation.
- Job specific training will be provided to those positions needing tailored training for their roles i.e. communications, procurement, reception to meet the IASR requirements.
- Training participation will be recorded and tracked to demonstrate that each employee/volunteer has completed.

**Measures implemented by HCCSS SW effective January 1, 2014 are as follows:**

#### **Training roles and responsibilities:**

We commit to training staff and volunteers on Ontario's accessibility laws and on accessibility aspects of the Ontario Human Rights Code that apply to persons with disabilities. Training will include:

- An overview of HCCSS SW policies and practices in communicating, interacting and providing access to services for people with various types of disabilities.
- Training will be provided in a way that best suits the duties of employees, volunteers, etc..
- A record will be kept of employees who have received training, including the dates on which training was provided, a summary of the contents of the training and the names of the individuals to whom it was provided.

### **FEEDBACK PROCESSES**

#### **Commitment:**

When asked, the HCCSS SW will receive and respond to feedback in an accessible manner to employees and members of the public who have a disability.

- Feedback process is already implemented with multiple options for feedback for the customer service component (email, mail, phone, online, in person). When all other IASR requirements come into play, multiple feedback options will also be available for those areas.
- Promoting feedback will be advertised on our website as well as at reception.

**Measures implemented by HCCSS SW effective January 1, 2014 are as follows:**

Feedback processes implemented may include but not limited to:

- Feedback is welcomed as it encourages continuous service improvements.
- Feedback from a member of the public about the delivery of goods and services to persons with disabilities may be given by telephone, in writing, in electronic format or through other methods.
- Information about the feedback process is available to the public through the HCCSS SW's website at [South West | Home and Community Care Support Services \(healthcareathome.ca\)](http://SouthWest|HomeandCommunityCareSupportServices.healthcareathome.ca).

**EMPLOYMENT PRACTICES**

**Commitment:**

The HCCSS SW is committed to fair and accessible employment practices, which includes:

- Recruitment
- Informing employees of supports
- Accessible formats and communication supports for employees
- Employee accommodation
- Employees returning to work
- Performance management, career development and redeployment

We will notify the public and staff that, when requested, we will accommodate disabilities during recruitment and assessment processes and when people are hired. If needed, we will create an individual accommodation plan and/or workplace emergency information for any employees who have a disability. Our performance management, career development, redeployment, and return-to-work processes will take into account the accessibility needs of employees with disabilities.

**Measures implemented by HCCSS SW effective January 1, 2014 are as follows:**

**Recruitment**

The HCCSS SW will make hiring accessible by.

- Let job applicants know that we will accommodate disabilities during the selection process. This is currently posted on our website and will be communicated when the successful applicants are contacted for an interview (email or telephone).
- If a job applicant requests accommodations, we will consult with them to make adjustments that best suit their needs. The applicant may also suggest an interview format that best works for them.
- Notify successful applicants of our policies for accommodating employees with disabilities. This will be provided upon job offer.

**Informing employees of supports:**

The HCCSS SW will inform employees about their policies for supporting employees with disabilities.

- We will inform our employees about our policies when the requirement comes into effect for our organization, when a policy changes and when a new hire starts.
- This will be communicated through email, internal websites, staff meetings, or one-on-one conversations and will require sign-off by each employee stating that they understand and will abide by these policies.

**Accessible formats and communication supports for employees:**

The HCCSS SW must make their information available to those employees with disabilities.

- When an employee with a disability asks for it, we will work with them to make workplace information accessible based on their individual needs (accessible formats, communication supports, etc.)
- Talk with employees with disabilities to learn what will help them access information and decide together how to make this information accessible to meet their needs.

### **Employee Accommodations:**

The HCCSS SW will develop individual accommodation plans for employees with disabilities in a clear and consistent way.

- Assess the accommodation needs of the employee and involve the disabled employee in the development of the plan.
- Discuss the accommodations that will be provided.
- Discuss emergency response plans to ensure their safety.
- Protect the privacy of employee's personal information.
- Inform the employee why a request will be denied for an accommodation plan.
- Provide plans in accessible formats, as requested.
- Review and update the plans with the employee as needed.

### **Employees returning to work:**

The HCCSS SW will outline the steps to take to help our employees return to work when they have been absent because of disability and need some form of disability-related accommodation to return to work.

- Determine whether the employee will need some form of employment-related accommodation to effectively return to work. If so, an accommodation plan will be created with the employee in consultation with their health care provider.
- Return to work program is already implemented, but will be updated to reference disability rather than just injury/illness.

### **Performance management, career development and redeployment:**

The HCCSS SW will take into account the accessibility needs of employees and any accommodation plans in regards to performance management, career development and job changes.

- Performance Management
  - Review employees' accommodation plans to understand their needs and see whether adjustments need to be made to help them succeed.
  - Make performance management documents available in accessible formats when asked.
  - Provide feedback and coaching in a way that is accessible to them.
- Career Development
  - When providing career development opportunities, consider what accommodations are needed to learn new skills or take on more responsibilities in their current position.
- Redeployment
  - Think about what can be done to help employees with disabilities succeed in other positions within the organization when they change jobs.

**Required legislative compliances: January 1, 2014**

**Completion dates: January 1, 2014**

## **JANUARY 1, 2015**

### **ACCESSIBLE FORMAT AND COMMUNICATION SUPPORTS**

#### **Commitment:**

The HCCSS SW is committed to let the public know that information will be made accessible upon request and will work with them to figure out how to meet their needs, as soon as possible.



**Measures implemented by HCCSS SW effective January 1, 2015 are as follows:**

The HCCSS SW will:

- Make it accessible upon request
  - When someone asks for accessible information, we will work with them to try to meet their needs. Either recreating a document in a different format or make information accessible by helping someone to use the original document or resource.
- Provide it as soon as possible
  - If unable to make the information accessible instantly, we will provide this as soon as possible, depending on the individual’s needs, the format or our resources.
- Let the public know
  - We will inform the general public that we will make information accessible upon request. This notice will be posted on our website and at our reception desk.
- When accessible information is requested, the communications department will ensure their needs are met.

**Required legislative compliance: January 1, 2014 – Feedback, January 1, 2015 – Accessible formats & Communication Supports (or other applicable compliance date as set out in the IASR)**

**Implementation timeframe: January 1, 2014 to January 1, 2015 (as applicable)**

**Completion date: January 1, 2015**

**JANUARY 1, 2014**

**ALL NEW INTERNET WEBSITES AND WEB CONTENT ON THOSE SITES MUST CONFORM WITH WCAG 2.0 LEVEL A**

**Action was not required by HCCSS, SW:**

HCCSS SW did not launch a new public website and web content or did not do significant site refresh for the January 1, 2014 timeline identified above. Therefore, HCCSS, SW was not required to meet the deadline.

- A new website is:
  - A website with a new domain name (e.g. [www.newbusiness.ca](http://www.newbusiness.ca))
  - A website undergoing a significant refresh
- A significant refresh typically means changing more than 50% of the content, design or technology of the website.

Content	Design	Technology
Creating, rewriting, or reorganizing more than 50% of the site’s content, such as graphics, text, widgets, etc.	Changing more than 50% of the design elements, such as layout, navigation, placement and style.	Changing more than 50% of the web publishing platform/model such as the content management system (CMS), Cascading Style Sheet (CSS), or HTML structure.

**JANUARY 1, 2021**

**ACCESSIBLE WEBSITES AND WEB CONTENT**

**Commitment:**

The HCCSS SW has ensured websites and web content is accessible based on the IASR requirements.

**Measures implemented by HCCSS SW effective January 1, 2021 are as follows:**

- AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives.

- The HCCSS SW website and all web content on this site published after January 1, 2012, has conformed with Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, other than providing caption on live videos (criteria 1.2.4) or audio descriptions for pre-recorded videos (criteria 1.2.5).
- Our internal website/intranet will not be accessible, however, we will work with individuals to make the content accessible to them in some way, when requested.
- The communications department along with HCCSS Information Technology providers will ensure we are compliant with the regulations.

**Items to consider for planned actions:**

In accordance with the IASR, HCCSS SW will:

- Ensure development of its next generation digital platform for public websites, and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology;
- Use guiding principles in the development of new corporate intranet applications as outlined by the Ontario Government's new Online Design Program standard, which specifies compliance with international accessibility guidelines, W3C WCAG 2.0;
- Follow the mandated Accessibility Directorate of Ontario (ADO) guidelines and Province of Ontario I&IT solutions that support obligated Private Sector and Broader Public Sector organizations in compliance initiatives;
- Partner with Corporate Communications and, in collaboration with operating divisions, provide guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats;
- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

**Required Legislative Compliance: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR. Completed.**

**Implementation timeframe: January 1, 2014 to January 1, 2021**

**Completion date: January 1, 2021**

**\*Abbreviations:**

*AODA – Accessibility for Ontarians with Disability Act*

*IASR – Integrated Accessibility Standards Regulations*

**Date of most recent review: January 2023**