

## Algoma Public Health – Policy and Procedure Manual – Employee Policies

<b>APPROVED BY:</b>	Medical Officer of Health	<b>REFERENCE #:</b>	01-
<b>SIGNATURE:</b>		<b>SECTION:</b>	Human Resources
<b>DATE:</b>	Original: 2013 Revised: December 28, 2023	<b>RESPONSIBLE:</b>	Director of Corporate Services
		<b>TERM:</b>	Annual Review
		<b>SUBJECT:</b>	Accessibility Policy

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### **POLICY STATEMENT AND STATEMENT OF COMMITMENT:**

Algoma Public Health (APH) 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 and are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (2005).

### **PURPOSE:**

In compliance with the [Accessibility for Ontarians with Disabilities Act \(AODA\), 2005](#), the purpose of this policy is to describe how APH will respond to our legislated obligations to identify, prevent and remove barriers for people with disabilities in our services, products and facilities – both internally in our organization, and in our interactions with our stakeholders and the public.

### **SCOPE / RESPONSIBILITY:**

The policy applies to all members of APH including every person who is an employee of, or a volunteer with APH, every person who participates in developing APH policies, and any member who provides services on behalf of the APH.

The Board of Health endeavours to demonstrate leadership for accessibility in the organization. The Board of Health through the Medical Officer of Health/Executive Officer ensures that this policy is followed. The Board of Health is responsible to ensure the Medical Officer/Executive Officer implements the accessibility policies in order to meet the legislated requirements of the [Ontario Regulation 191/11 Integrated Accessibility Standards](#).

### **PROCEDURE:**

APH strives to ensure an accessible environment for all persons with disabilities and will build upon and improve practices. In addition, APH ensures that it meets the accessibility needs of persons with disabilities in a timely manner, consistent with the specific requirements of the Act and its regulations. APH ensures compliance with the Integrated Accessibility Standards by ensuring time frames established by the Regulation are met.

The IASR includes general information and requirements that apply to all the standards. In addition, the Ontario Regulation 191/11: Integrated Accessibility Standards ([IASR](#)) has a grouping of four standards that are also applicable to APH:

- [Part I: General AODA Requirements](#)
- [Part II: Information and Communications Standards](#)
- [Part III: Employment Standards](#)
- [Part IV.1: Design of Public Spaces \(Accessibility Standards for the Built Environment\)](#)
- [Part IV.2: Customer Service Standards](#)

The IASR requirements are not a replacement for the [Ontario Human Rights Code](#) requirements and they do not limit obligations under any other legislation. Therefore, if two laws conflict with one another, the law that provides the higher level of accessibility is the law that must be followed.

## I) **GENERAL REQUIREMENTS:**

### 1.1 Accessibility Plan

To meet its requirements under the Regulation, APH has an accessibility plan outlining its strategy to prevent and remove barriers from its workplace. APH's responsibility is to:

- i) post the accessibility plan on its website and provide the accessibility plan in an accessible format upon request;
- ii) prepare an annual status report on the measures taken to implement the accessibility plan, and post the report on its website, and
- iii) review and update the accessibility plan at least every five (5) years and in consultation with persons with disabilities.

### 1.2 Training

APH provides training on the requirements of the IASR and also on Ontario Human Rights Code as it pertains to persons with disabilities to those referred to in the Scope / Responsibility section.

Training will be appropriate to the duties of the employees, volunteers, and other persons and will be provided as soon as practicable.

Training is provided in respect of any changes to the accessibility policies/standards on an ongoing basis.

Records of the training provided are kept, which include the dates on which the training is provided and the individuals to whom it is provided.

### 1.3 Accessible Procurement

APH ensures that APH's procurement processes incorporate accessibility design, criteria and features, except where it is not practicable to do so. Where it is impracticable to incorporate accessibility into the procurement process, APH will provide an explanation upon request.

## II) **INFORMATION AND COMMUNICATIONS:**

### 2.1 Feedback

- APH's responsibility is to ensure that the process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provisions of, accessible formats and communication supports, upon request.
- APH ensures the public is aware of the availability of accessible formats and communication supports with respect to the feedback process.

### 2.2 Accessible Formats and Communication Supports

- Upon request, APH provides or arranges for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.
- APH consults with the requestor to determine the most appropriate accessible format or communication support. If APH determines that the requested information or communications are unconvertible, APH will provide the requestor with (a) an explanation as to why the information or communications are unconvertible, and (b) a summary of the unconvertible information or communications in a format that is accessible to the requestor.
- If there is a cost, the cost will be no more than a regular cost charged to other persons.

- The availability of accessible formats and communication supports is posted on its website and through signage in APH offices.
- Accessible Formats and Communication Supports that takes into account the person's accessibility needs due to a disability, unless such information is unconvertible.

#### **2.4 Emergency Procedure, Plans or Public Safety Information**

- APH provides information in an accessible format or with appropriate communication supports, as soon as practical upon request.

#### **2.3 Website**

- APH's public website including web content, conforms to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA.

### **III) EMPLOYMENT STANDARDS:**

#### **3.1 Recruitment**

- APH notifies its employees and the public about the availability of accommodations for applicants with disabilities in the APH recruitment process.
- The availability of accommodations for applicants is stated on all job postings.
- APH notifies job applicants (when they are individually selected to participate further in an assessment or selection process), that accommodations are available upon request in relation to the materials or processes to be used.
- If a selected applicant requests an accommodation, APH consults with the applicant and provides, or arranges for the provision of, suitable accommodation in a manner that takes into account the applicants accessibility needs due to disability.
- When making offers of employment, APH notifies the successful applicant of policies for accommodating employees with disabilities.

#### **3.2 Informing Employees of Supports**

- APH informs its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information is provided to new employees as soon as practical after commencing employment.

#### **3.3 Accessible Formats and Communication Supports**

- Upon the request of an employee with a disability, APH consults with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees.
- In determining the suitability of an accessible format or communication support, APH will consult with the employee making the request.

#### **3.4 Workplace Emergency Response Information**

- APH provides individualized workplace emergency response information to APH employees if APH is aware of the need for accommodation due to an employee's disability. APH provides this information as soon as practicable after becoming aware of the need for accommodation.
- APH with the consent of the employee, provides the workplace emergency response information to the person designated by APH to provide assistance to the employee.
- The workplace emergency response information is reviewed by APH when:
  - i) the employee moves to a different location in the organization;
  - ii) when the employee's overall accommodations needs or plans are reviewed, and

iii) when APH reviews its general emergency response policies.

### **3.5 Documented Individual Accommodation Plans**

- APH maintains a written process for the development of documented individual accommodation plans for employees with disabilities.
- Information regarding accessible formats and communications supports provided is included in individual accommodation plans.
- The plans include individualized emergency response information where required and identify any other accommodation that is to be provided.

### **3.6 Return to Work**

- APH maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.
- The process outlines the steps APH takes to facilitate the return to work and includes documented individual accommodation plans as part of the process.
- This return to work process does not replace or override any other return to work process created by or under any other statute.

### **3.7 Performance Management, Career Development, and Advancement & Redeployment**

- APH considers the accessibility needs of employees with disabilities, as well as takes into account the individual accommodation plans, when conducting performance management, providing career development and advancement opportunities to employees.

## **IV) CUSTOMER SERVICE STANDARDS:**

### **4.1 Establishment of Policies**

- Accessibility measures are built into decision-making processes, short- and long-term program planning, purchasing, event planning, emergency planning, and the development of new services.
- Policies, procedures, and practices are developed taking persons with disabilities into consideration and are available upon request.

### **4.2 Communication**

- Employees communicate with people with disabilities in ways that take into account their disabilities. Accessible customer service requires employees to overcome and find ways around different barriers that clients may have.

### **4.3 Assistive Devices**

- APH makes reasonable efforts to ensure that any assistive device required by a person with a disability can be used by such person when on APH premises.

### **4.4 Use of Service Animals and Support Persons**

- APH allows people with disabilities to be accompanied by their service animal in those areas of the premises that APH owns or operates that are open to the public, unless the animal is excluded by law, such as food preparation areas as prohibited by Food Premises, R.R.O. 1990, Reg. 562 under the Health Protection & Promotion Act, R.S.O. 1990, c. H. 7. If a service animal is excluded by law, employees will use other measures to provide services to the person with a disability.
- In cases where an employee cannot identify that an animal is a service animal, it may be requested that the client provide documentation from a regulated health professional authorized under s. 80.45 (4b) of Reg. 191/11 that confirms the person's need for the service animal.
- If a person with a disability is accompanied by a service animal, the person is permitted to keep the animal with him or her during the provision of service.

- In cases that call into question the health or safety of the person with the disability or others on the premise, APH may require people with a disability to be accompanied by a support person. Employees will consult with the person with a disability, consider health or safety reasons based on available evidence, and determine if there is no other reasonable way to protect the health or safety of the person or others on the premises prior to deciding if a support person is required. If it is determined that a support person is required, APH will waive the admission fee or fare, if applicable, for the support person.
- If a person with a disability is accompanied by a support person, APH ensures that the person with the disability is not prevented from having access to the support person while on the premises.

#### **4.5 Training for Staff, etc.**

- In addition to 1.2, APH ensures that all staff, volunteers, persons who develop policies, and all others who provide service on behalf of APH, receive training about how to provide accessible customer service to persons with disabilities.
- Training includes:  
An overview of the AODA;
  - The customer service standards set out in O. Reg. 191/11;
  - How to interact and communicate with people with various types of disabilities;
  - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
  - How to use any equipment or devices available at APH workplaces to assist with providing programs or services to persons with disabilities; and
  - What to do if a person with a disability is having difficulty accessing APH's programs or services.
- This training will be provided to all new employees during onboarding. Additional training will be provided to all employees in the event that changes are made to the policy. Training records will be kept as a record of who has been trained and when they were trained.

#### **4.6 Notice of Temporary Service Disruption**

- In the event of a planned or unexpected disruption to services or facilities for clients with disabilities on any APH premises, APH will notify clients promptly. A clearly posted notice will include information about the reasons for the disruption, its anticipated length of time and a description of alternative facilities or services, if available. The notice will be posted in conspicuous places at the affected premise and/or by placing the notice on the website.

#### **4.7 Feedback Process**

- APH welcomes feedback on how our services are provided to people with disabilities. Feedback may be provided by:
  1. Submitting a Customer Feedback Form. This form is available in-person from the receptionist in each APH office or online at [www.algomapublichealth.com](http://www.algomapublichealth.com);
  2. Calling APH at (705) 942-4646; or
  3. E-mailing [hr@algomapublichealth.com](mailto:hr@algomapublichealth.com).
- All feedback, including complaints, will be handed by Human Resources. A written response will be provided within 10 business days.

#### **Compliance**

- APH ensures the completion of compliance reporting and meeting the compliance deadlines as outlined in the Ontario Regulation 191/11 Integrated Accessibility Standard.