

**Centretown Community Health Centre – Multi-Year Accessibility Plan  
(2013/2025)**

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## Executive Summary

CCHC welcomes and encourages people with disabilities to use its services and will provide access in a way that respects their rights to dignity, independence and integration.

This commitment is consistent with CCHC's mission to deliver services in a welcoming and supportive environment and with CCHC's core values of equity, accessibility, diversity and fairness in the treatment of all individuals. CCHC will establish practices and procedures that support the accessibility standards established under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") on customer service, information and communication, employment and the built environment.

CCHC will make all reasonable efforts to meet the needs of people with disabilities. Reasonable efforts are defined as providing the best possible service within the context of: available resources, balancing the needs of people with disabilities or others who may encounter barriers to access with those of the community at large, safeguarding the health and safety of CCHC service providers.

CCHC will establish policies, practices and procedures which support the accessibility standards established under the AODA on customer service, information and communication, employment, transportation and the built environment.

## Aim and Objectives

This Plan is intended to continue to move CCHC toward its vision of accessibility and inclusion for all who come to work or use their facilities and services.

CCHC will establish, implement and maintain a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements. The multi-year accessibility plan will indicate how CCHC intends to implement the requirements of the Integrated Regulation within legislated timelines. It will also address the identification, removal and prevention of barriers to people with disabilities in the organization.

Specifically, the multi-year plan will:

1. provide a framework for developing cohesive accessibility initiatives which identify, remove and prevent barriers;
2. set annual goals for specific improvements to accessibility;

3. establish action plans for meeting those goals and initiating accountability at various levels; and,
4. seek input and suggestions from the wider organizational community.

This document retains a progressive plan of activities that forecast full implementation of the AODA standards by 2025. This Plan will be updated annually to reflect progress made towards full compliance with the AODA.

## Barrier identification methodology

CCHC uses the following barrier-identification methodologies to identify the list of barriers to be addressed.

Barrier type	Information source	Description
<b>Architectural and physical</b>	<ul style="list-style-type: none"> <li>• Joint Occupational Health Committee</li> </ul>	<ul style="list-style-type: none"> <li>• Audit conducted quarterly by committee members</li> </ul>
<b>Information or communications</b>	<ul style="list-style-type: none"> <li>• Communications team</li> </ul>	<ul style="list-style-type: none"> <li>• Audit conducted quarterly by communications officer and/or assigned staff</li> </ul>
<b>Attitudinal</b>	<ul style="list-style-type: none"> <li>• Staff survey</li> <li>• Volunteer survey</li> </ul>	<ul style="list-style-type: none"> <li>• Conducted once every two years by corporate services</li> </ul>
<b>Technological</b>	<ul style="list-style-type: none"> <li>• Communications team</li> <li>• Staff and Client surveys</li> </ul>	<ul style="list-style-type: none"> <li>• Audit conducted quarterly</li> <li>• Client survey conducted yearly and staff survey every two years</li> </ul>
<b>Organizational</b>	<ul style="list-style-type: none"> <li>• Staff survey</li> <li>• Accreditation</li> </ul>	<ul style="list-style-type: none"> <li>• Staff survey every two years</li> <li>• Accreditation every 4 years</li> </ul>

It should be noted that a number of other stakeholders and groups within and outside the organization can provide input as it relates to barrier types identification and remediation. Examples of those would include the Human Resources committee, the Health Equity Committee, the management team, etc.

## Review and Monitoring process

Accessibility planning is an important means of improving both the safety and quality of service delivery to the populations we serve, of attracting and retaining employees, and of increasing the efficiency of our operations. It also leads to improved client and community members' experiences.

CCHC (through its Corporate Services) will review progress and respond to issues that require attention. Suggested changes/amendments to the Plan will be communicated to senior management as required.

## CCHC Accessibility Plan

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
Customer Service Standard. Reg 429/07	Establishment of Policies, Practices and Procedures	<p>Policies and Practices must be compatible with the following principles:</p> <ol style="list-style-type: none"> <li>1. Respect for dignity and independence</li> <li>2. Integration</li> <li>3. Equity</li> </ol> <p>Specific Policies and Procedures will be developed on:</p> <ol style="list-style-type: none"> <li>1. Use of Service Animals and Support Persons</li> <li>2. Notice of temporary disruptions</li> <li>3. Offering a range of Assistive Devices</li> <li>4. Offering of Transportation Assistance</li> </ol>	<b>COMPLETED</b> (see policy ORG 1-18)	January 1, 2014
	Training	<p>Customer Service training must be provided for:</p> <ul style="list-style-type: none"> <li>• Those (employees and volunteers) who interact with members of the public on behalf of CCHC</li> <li>• Persons who participate in developing the CCHC's policies, practices and procedures</li> <li>• Other persons who provide goods, services and facilities on behalf of CCHC to members of the public or other third parties</li> </ul>	<p><b>COMPLETED</b> (see policy ORG 1-18)</p> <p>On-line training provided:  <a href="http://www.mcass.gov.on.ca/en/serve-ability/index.aspx">http://www.mcass.gov.on.ca/en/serve-ability/index.aspx</a></p>	January 1, 2015
	Feedback Process	<p>Establish an accessible process for receiving and responding to feedback about the manner in which CCHC provides goods or services to persons with disabilities. The information about the process will be readily available to the public.</p>	<b>COMPLETED</b> (see policy ORG 1-18)	January 1, 2015

**PART I: GENERAL**

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation (IAS-R) o.Reg.191/11,s.3	<b>Establishment of Accessibility Policies</b>	s. 3(1) CCHC as an obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation.	<b>COMPLETED</b> (see policy ORG 1-18)	January 1, 2014
IAS-R O.Reg.191/11, s.4	<b>Accessibility Plan</b>	s. 4(1) CCHC as a large organization 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 requirement under this Regulation;  b. post the accessibility plan on its website, and provide the plan in an accessible format upon request; and  c. review and update the accessibility plan at least once every 5 years	<b>COMPLETED</b>	January 1, 2014
		s. 4(3) CCHC similarly to designated public sector organizations shall:  a. Prepare an annual status report on the progress of measures taken to implement the strategy referenced in clause (1) (a)	<b>COMPLETED</b>	January 1, 2014
IAS-R O.Reg. 191/11, s.6	<b>Self-Service Kiosk</b>	CCHC, as a large organization, shall have regards to the accessibility of persons with disabilities when designing, procuring or acquiring self-service kiosk	<b>CCHC does not utilize self-service kiosks</b>	January 1, 2014
IAS-R O.Reg. 191/11, s.7	<b>Training</b>	s. 7(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with	<b>ONGOING</b> (volunteer training still to come)	January 1, 2015

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
		disabilities to, <ul style="list-style-type: none"> <li>a. All employees and volunteers;</li> <li>b. B. all persons who participate in developing the organization's policies: and,</li> <li>c. All other persons who provide goods, services or facilities on behalf of the organization.</li> </ul>		

**PART II: INFORMATION AND COMMUNICATION STANDARDS**

<b>AODA Standard/Regulation Section References</b>	<b>Initiative/Action</b>	<b>Description</b>	<b>CCHC Completion Status</b>	<b>AODA Compliance Date</b>
IAS-R O.Reg.191/11, s.11	<b>Feedback</b>	s.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.	<b>COMPLETED</b> (see policy ORG 1-18)	January 1, 2015
IAS-R O.Reg. 191/11, s.12	<b>Accessible formats and Communications Supports</b>	2. 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 person 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.	<b>COMPLETED</b> (see policy ORG 1-18)	January 1, 2016
		s. 12(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<b>COMPLETED</b> (see policy ORG 1-18)	January 1, 2016
		s. 12(3) every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<b>IN PROGRESS</b>	January 1, 2016
IAS-R O. Reg 191/11, s.13	<b>Emergency procedure plans, or public safety information</b>	2. 13 (1) in addition to its obligation under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	<b>COMPLETED</b>	January 1, 2012

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
		CCHC shall develop specific Policies and Procedures on: a. Measures to be taken by employees to assist people with disabilities in regards to emergency procedures and public safety.		
IAS-R O.Reg.191/11, s.14	<b>I. Accessible websites and web content (first phase)</b>  <b>II. Accessible websites and web content (second phase)</b>	s. 14 (2) Large organization shall make their internet website and web content confirm with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A  s. 14(2) Large organization shall make their internet websites and web content confirm with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA	<b>ONGOING</b>	January 1, 2014 – new internet and intranet sites and web content on those sites must conform with WCAG 2.0 Level A.  January 1, 2021 – all internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> <li>i. success criteria 1.2.4 Captions (Live), and</li> <li>ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>



**PART III – EMPLOYMENT STANDARDS**

<b>AODA Standard/Regulation Section References</b>	<b>Initiative/Action</b>	<b>Description</b>	<b>CCHC Completion Status</b>	<b>AODA Compliance Date</b>
IAS-R O.Reg. 191/11, s.11	<b>Feedback</b>	s. 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.	<b>COMPLETED (see policy ORG 1-18)</b>	January 1, 2015
IAS-R O. Reg. 191/11, s. 12	<b>Accessible Formats and Communication Supports</b>	s. 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, c. in a timely manner that takes into account the person’s accessibility needs due to disability; and d. at a cost that is no more than the regular cost charged to other persons.	<b>COMPLETED (see policy ORG 1-18)</b>	January 1, 2016
		s. 12 (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<b>COMPLETED (see policy ORG 1-18)</b>	January 1, 2016
		s. 12 (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<b>IN PROGRESS</b>	January 1, 2016
IAS-R O. Reg. 191/11, s. 22	<b>Recruitment-General</b>	s. 22 Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<b>IN PROGRESS Is our current practice but policy needs to be update.</b>	January 1, 2016
IAS-R O. Reg. 191/11, s. 23	<b>Recruitment-Assessment or Selection Process</b>	s. 23 (1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	<b>IN PROGRESS Is our current practice but policy needs to be update.</b>	January 1, 2016

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
		(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.		
	<b>Recruitment – Notice to Successful Applicants</b>	s. 24 s. 24 Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<b>IN PROGRESS</b> Is our current practice but policy needs to be update.	January 1, 2016
	<b>Informing Employees of Supports</b>	s. 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.	<b>COMPLETED</b>	January 1, 2016
		s. 25 (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<b>COMPLETED</b>	January 1, 2016
IAS-R O. Reg. 191/11, s. 25	<b>Informing Employees of Supports (cont'd.)</b>	s. 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.	<b>COMPLETED</b>	January 1, 2016
IAS-R O. Reg. 191/11, s. 26	<b>Accessible Formats and Communication Supports for Employees</b>	s. 26 (1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.	<b>COMPLETED</b>	January 1, 2016
		s. 26 (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<b>ON-GOING</b>	January 1, 2016

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
	<b>CCHC initiatives on Assistive Devices</b>	CCHC recognizes that a broad range of assistive devices are required to meet the needs of people with disabilities and will make reasonable efforts to provide assistive devices, for people with disabilities, upon request.	<b>COMPLETED</b> (see policy ORG 1-18)	January 1, 2012
IAS-R O. Reg. 191/11, s. 27	<b>Workplace Emergency Response Information</b>	s. 27 (1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	<b>COMPLETED</b>	January 1, 2012
		s. 27 (2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	<b>COMPLETED</b>	January 1, 2012
		s. 27 (3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	<b>COMPLETED</b>	January 1, 2012
		s. 27 (4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	<b>COMPLETED</b>	January 1, 2012
IAS-R O. Reg. 191/11, s. 28	<b>Document Individual Accommodation Plans</b>	s. 28 (1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	<b>IN PROGRESS</b>	January 1, 2016
		s. 28 (2) The process for the development of documented individual accommodation plans shall include the following elements:		January 1, 2016

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
		<ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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.</li> <li>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 where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</li> <li>5. The steps taken to protect the privacy of the employee's personal information</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ol>		
IAS-R O. Reg. 191/11, s. 29	<b>Return to Work Process</b>	s. 29 (1) Every employer, other than an 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-	<b>COMPLETED</b>	January 1, 2016

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
		related accommodations in order to return to work; and  (b) shall document the process.		
		s. 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.	<b>COMPLETED</b>	
		s. 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.	<b>COMPLETED</b>	January 1, 2016
IAS-R O. Reg. 191/11, s. 30	<b>Performance Management</b>	s. 30(1) An employers 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.	<b>IN PROGRESS</b>	January 1, 2016
IAS-R O. Reg. 191/11, s. 31	<b>Career Development and Advancement</b>	s. 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.	<b>COMPLETED</b>	January 1, 2016
IAS-R O. Reg. 191/11, s. 32	<b>Redeployment</b>	s. 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.	<b>COMPLETED</b>	January 1, 2016

## PART VI – DESIGN OF PUBLIC SPACES

AODA Standard/Regulation Section References	Initiative/Action	Description	CCHC Completion Status	AODA Compliance Date
IAS-R O. Reg. 191/11, s. 80.43	<b>Waiting areas</b>	<p>s. 80.43</p> <p>(1) When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating must be accessible, but in no case shall there be fewer than one accessible seating space. O. Reg. 413/12, s. 6.</p> <p>(2) For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait. O. Reg. 413/12, s. 6</p>	<b>IN PROGRESS</b>	Jan 1, 2017
IAS-R O. Reg. 191/11, s. 80.44	<b>Maintenance of accessible elements</b>	<p>s. 80.44 In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following:</p> <p>1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.</p> <p>2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6.</p>	<b>IN PROGRESS</b>	Jan 1, 2017

## Definitions

For the purposes of this Plan, the following definitions apply.

A “**barrier**” is 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 informational or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice (organizational barrier).<sup>1</sup>

**Architectural and physical** barriers are features of buildings or spaces that cause problems for people with disabilities. Examples are:

- hallways and doorways that are too narrow for a person using a wheelchair, electric scooter or walker
- counters that are too high for a person of short stature
- poor lighting for people with low vision
- doorknobs that are difficult for people with arthritis to grasp
- parking spaces that are too narrow for a driver who uses a wheelchair
- telephones that are not equipped with telecommunications devices for people who are Deaf, deafened or hard of hearing

**Information or communications** barriers happen when a person can't easily understand information. Examples are:

- print is too small to read
- websites that can't be accessed by people who are not able to use a mouse
- signs that are not clear or easily understood
- a person who talks loudly when addressing a person with a hearing impairment

**Attitudinal** barriers are those that discriminate against persons with disabilities. Examples are:

- thinking that persons with disabilities are inferior
- assuming that a person who has a speech impairment can't understand you
- a receptionist who ignores a customer in a wheelchair

**Technological** barriers occur when a technology can't be modified to support various assistive devices. An example is:

- a website that doesn't support screen-reading software

**Organizational** barriers are an organization's **policies, practices or procedures** that discriminate against persons with disabilities.

Examples are:

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<sup>1</sup> A Guide to Annual Accessibility Planning, under the Ontarians with Disabilities Act, 2001, <http://www.gov.on.ca/citizenship/accessibility/english/accessibilityplanning.pdf>, p. 8

- a hiring process that is not open to persons with disabilities
- a practice of announcing important messages over an intercom that persons with hearing impairments cannot hear clearly<sup>2</sup>

**Disability is:**

1. Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
2. A condition of mental impairment or a developmental disability,
3. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. A mental disorder, or
5. An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.<sup>3</sup>

## Conclusion

The Board, Management, and staff of CCHC are aware of the fact that further steps need to be taken to help CCHC become completely barrier free, physically, attitudinally, and socially. The Accessibility Plan presented above reflects a commitment to initiatives with the expectation that CCHC will be free of attitudinal, physical and social barriers by the year 2025.

## Key Highlights for 2014-2015

- CCHC renovated 6000 sq. ft. of office space meeting new accessibility standards
- New Quarterly Communications audits allows the organization to ensure it meets its obligation such as tower signage and way finding
- Major renovation of 27 000 sq. ft. of space (2015-2018) to be conducted using updated Ontario building codes
- CCHC Website is expected to meet WCAG 2.0 by the end of 2014 (6 years before imposed deadline)

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<sup>2</sup> Ministry of Community and Social Services website - [http://www.mcscs.gov.on.ca/en/mcscs/programs/accessibility/understand\\_accessibility/what\\_barriers.aspx](http://www.mcscs.gov.on.ca/en/mcscs/programs/accessibility/understand_accessibility/what_barriers.aspx)