



Seaway Valley Community Health Centre

Working with you for a Healthier Community

Accessibility for Ontarians with Disabilities Act (AODA)

Integrated Accessibility Standards Regulation (IASR) Employment Policy

POLICY:

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Employment Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Seaway Valley Community Health Centre (SVCHC) follow the principles of dignity, independence, integration and equal opportunity.

Definitions

Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Kiosk – An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements
- B. Recruitment, Assessment and Selection
- C. Accessible Formats and Communication Supports for Employees
- D. Workplace Emergency Response Information
- E. Documented Individual Accommodation Plans



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F. Performance Management and Career Development and Advancement

G. Return to Work

H. Redeployment

I. Feedback Process

J. Review

A. General Requirements

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

Establishment of Accessibility Policies and Plans

SVCHC will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

SVCHC will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

Training Requirements

SVCHC will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing SVCHC's policies, and all other persons who provide goods, services or facilities on behalf of SVCHC.

Training will be provided as soon as is reasonably practicable, but no later than 30 days after hire for full time employees. Training will be provided on an ongoing basis to new employees and as changes to SVCHC's accessibility policies occur. Students are required to have completed, and provide evidence of such AODA training from their educational institution, prior to starting student placements or student employment with SVCHC.

Records

SVCHC will maintain records on the training provided, when it was provided and the number of employees that were trained.

B. Recruitment, Assessment and Selection

SVCHC will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are



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available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, SVCHC will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of SVCHC's policies and supports for accommodating people with disabilities.

C. Accessible Formats and Communication Supports for Employees

SVCHC will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, SVCHC will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

SVCHC will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

D. Workplace Emergency Response Information

Where required, SVCHC will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- SVCHC reviews general emergency response policies.

E. Documented Individual Accommodation Plans

SVCHC will strive to ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines.

SVCHC will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;



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- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:

- Include information regarding accessible formats and communication supports upon request;
- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

F. Performance Management and Career Development and Advancement

SVCHC will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Individual accommodation plans will be consulted, as required.

G. Return to Work

SVCHC will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps SVCHC will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

H. Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

Individual accommodation plans will be consulted, as required.

I. Feedback Process



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If any client, staff, volunteer, student or member of the public feels they have not received accessible customer service, please follow the follow process:

1. Contact SVCHC's Executive Director in person, by telephone, fax or email at www.seawayvalleychc.ca.
 2. Let the Executive Director know that you wish comment on your accessibility experience;
 3. Explain the purpose of your feedback (for example, to prevent the same problem from happening again);
 4. If necessary, you may be invited provide the feedback in writing to explain:
 - the problem
 - how it affected you
 - your rights under the law
 - provide your contact information in case there are further questions.
- The Executive Director (or delegate) will review the complaint or feedback and thank the individual for providing it.
 - The Executive Director (or delegate) will consult with appropriate staff as needed, and reply to the complainant within 72 hours. The Executive Director will work to resolve the matter within 10 working days. The Executive Director will use various accessible formats to communicate with the complainant, (i.e., HTML and Microsoft Word, braille, accessible audio formats, large print, text transcripts of visual and audio information), and will respond in writing by email, by regular mail, by telephone call, by fax message or in person by scheduled appointment.
 - Any changes or improvements made as a result of the feedback or complaint will be communicated using various accessible communication formats and supports (i.e., reading the written information aloud to the person directly, exchanging hand-written notes (or providing a note taker or communication assistant), captioning or audio description, assistive listening systems, augmentative and alternative communication methods and strategies (e.g., the use of letter, word or picture boards, and devices that speak out), sign language interpretation and intervenor services, and/or repeating, clarifying or restating information) as required with staff and volunteers and to all others also using any or all of the accessible communication formats and supports as noted above.

J. Review

This policy will be reviewed regularly to ensure that it is reflective of SVCHC's current practices as well as legislative requirements.

Acknowledgment and Agreement

I, (Employee Name), acknowledge that I have read and understand the AODA – *Integrated Accessibility Standards Regulation* (IASR) Employment Policy of SVCHC. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules set forth in this policy, I may face corrective action.



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Name: _____

Signature: _____

Date: _____

Witness: _____