

# Northwestern Health Unit – 2017 Accessibility Plan

December 2016

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This document will be made available in alternate formats upon request, such as: electronic, audio, large font, text only, or clear language summary. Requests for other formats are considered.

The material in this plan has been prepared for specific use by the Northwestern health Unit and adapted from the Sudbury & District Health Unit (2013).

For information please contact [accessibility@nwhu.on.ca](mailto:accessibility@nwhu.on.ca).

This report is available online at [www.nwhu.on.ca](http://www.nwhu.on.ca).

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# Our Commitment

The Northwestern Health Unit values all of our clients and customers and is committed to providing excellent customer service in every aspect of our business.

We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by identifying, removing and preventing barriers for people with varying abilities and by meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

We are 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 believe in providing service to everyone.

## Introduction

As a public service the Northwestern Health Unit is committed to identifying, removing, and preventing barriers for people with varying abilities. Providing inclusive services leads to better service for people with varying abilities today and lays the ground work for accommodating our aging population for the future. By adopting the principles of universal design, accessibility has broader impacts, assisting children, older adults, families, and just about anyone who appreciates barrier-free access, clear language, and getting the right service when you need it.

In Ontario there are two broad pieces of legislation addressing accessibility for people with disabilities: the *Ontarians with Disabilities Act, 2001* (ODA); and the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). In response to the reporting requirements of the AODA, the Northwestern Health Unit is pleased to present its Accessibility Plan.

## Accessibility Legislation

*Ontarians with Disabilities Act, 2001* (ODA) and *Accessibility for Ontarians with Disabilities Act, 2005* (AODA)

When it was enacted, the *Ontarians with Disabilities Act, 2001* (ODA) was ground breaking, leading the way in identifying, preventing, and removing public sector barriers for people with disabilities. The ODA required municipalities with over 10,000 people to:

- Prepare an annual accessibility plan.
- Establish and seek advice from an Accessibility Advisory Committee, whose membership must include people with disabilities.

While the ODA provided the mandate for public sector organizations to identify, prevent, and remove barriers for people with disabilities, there were a few gaps left unmet by the legislation. First, the ODA applied only to the public sector, not the private sector. The ODA also did not provide direction for organizations on which barriers to focus on, or how to ensure the accessibility of goods, services, and facilities, resulting in inconsistencies across the province.

In 2005, the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) was passed, giving the Province the mandate to establish standards in accessibility that will apply to both the public and private sector. The government of Ontario committed to establishing accessibility standards in:

- Customer Service
- Information and Communication
- Employment
- Transportation
- Built Environment

Recognizing the history of discrimination against people with disabilities in Ontario, the purpose of this Act is to benefit all Ontarians by:

- Developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025; and
- Providing for the involvement of people with disabilities, the Government of Ontario and of representatives of industries and various sectors of the economy in the development of accessibility standards.

The standards require the people or organizations identified in the standard to identify, remove and prevent barriers for people with disabilities in key areas of daily living. Barriers keep people with disabilities from fully participating in activities that most of us take for granted.

The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) applies to every person or organization in the public and private sectors in the Province of Ontario, including the Legislative Assembly of Ontario.

In January 2009, the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* came into effect. This regulation establishes accessibility standards for customer service and applies to every public sector organization and to every other person or organization that provides goods and services to members of the public or other third parties and has at least one employee in Ontario.

Under the AODA Customer Service Standard, the Northwestern Health Unit must:

- Establish written policies, practices and procedures on providing goods or services to people with varying abilities and let clients know that the documents are available upon request (in a format that takes into account their disability).
- Make reasonable efforts to ensure that policies, practices and procedures are consistent with the principles of independence, dignity, integration and equality of opportunity.
- Have a policy dealing with people's use of their own assistive devices to access goods or services or any other measures the organization offers to enable an individual access the goods or services.
- Communicate with a person with a disability in a manner that takes into account their disability.

- Let people with disabilities bring their service animals onto the parts of the premises open to the public or other third parties, except where the animal is otherwise excluded by law from the premises.
- Allow people with disabilities be accompanied by their support persons while on the parts of the provider's premises open to the public or other third parties.
- If a provider charges admission, let people know ahead of time what, if any, admission will be charged for a support person.
- Provide notice when facilities or services that people with disabilities usually use to access goods or services are temporarily disrupted.
- Train anyone who interacts with the public or other third parties on the provider's behalf on topics outlined in the customer service standard.
- Train anyone who is involved in developing the provider's customer service policies, practices and procedures on topics outlined in the customer service standard.
- Establish a process for receiving and responding to feedback about the way the organization provides goods or services to people with disabilities, including the actions to be taken if a complaint is received, and make information about the process readily available to the public.

On June 3, 2011 the Province of Ontario released the *Integrated Accessibility Standard, Ontario Regulation 191/11* (IAS), which combined the accessibility requirements for information and communication, employment, and transportation, and included general requirements such as policy development, planning, and training. The implementation of the IAS is to occur in a staged approach, meaning that compliance with the different provisions of the standard will be required at different times. The Northwestern Health Unit is required to meet the IAS by January 1, 2021.

The Accessibility Standards for the Built Environment focus on removing barriers in two areas:

1. buildings
2. public spaces

On December 27, 2013, *Ontario Regulation 368/13* was filed to amend the *new 2012 Building Code, O.Reg. 332/12*. The amended requirements in the Building Code will substantially enhance accessibility in newly constructed buildings and existing buildings that are to be extensively renovated. The effective date of the amendment is January 1, 2015.

## Accessibility Planning

The Manager of Human and Financial Resources maintains an **Accessibility Plan** outlining the health unit's strategy to identify, prevent and remove barriers and to improve opportunities for people with disabilities.

All staff have input into the Accessibility Plan.

Feedback from community members is taken into account during review of the plan.

## 2015 Requirements & Activities

### Training

Required by: January 1, 2015

- Train employees, volunteers and all those who participate in developing the Health Unit policies and all others who provide goods or services on behalf of the Health Unit about requirements in the Integrated Standards as well as the Ontario Human Rights Code as it relates to people with disabilities.
- Identify key training messages and methods to deliver training for employees, volunteers, and others required to be trained under the IAS.
- Develop training modules/presentations and materials.
- Implement training for all employees, volunteers, and others in IAS.
- Implement training specific to duties being performed.
- Keep records of training provided.

Completed December 2014

### Feedback

Required by: January 1, 2015

- Identify best practices for providing accessible formats and communication supports for those requesting to participate in providing feedback for programs, services, and facilities.
- Incorporate best practices and materials in IAS accessibility training.
- Ensure and provide notice that feedback processes are accessible to people with disabilities.

Completed December 2014

## 2016 Requirements & Activities

### Accessible Formats and Communication Supports

Required by: January 1, 2016

- Identify best practices for providing accessible formats and communication supports of information to the public in a timely manner.
- Incorporate best practices and materials in IAS accessibility training.
- Upon request provide or arrange for the provision of accessible formats and communication supports for persons with varying abilities.

- Develop process and materials for staff members to follow if a request for an accessible format or communication support cannot be filled because the information is considered “unconvertible”.

Completed January 1, 2016

### **Accessible Websites and Web Content**

Required by: January 1, 2014 (new or significantly up-graded); January 1, 2021 (existing)

- Incorporate website accessibility features in any procurement processes for new websites.
- Identify best practices for developing and assessing accessible electronic documents and accessible web content.
- Communicate best practices to web content managers and web content developers.
- Incorporate best practices and materials in IAS accessibility training.
- Improve the accessibility of inaccessible components of existing websites from 2012-2020.

In Progress

### **Employee Supports**

Required by: January 1, 2016

- Notify the public and employees of the availability of accommodation upon request for applicants with varying abilities in the recruitment and selection materials and processes.
- Notify successful applicants of policies for accommodating employees with varying abilities.
- Notify successful applicants of policies for accommodating employees with varying abilities.
- Inform all existing and new employees of policies to support employees with varying abilities.
- Provide or arrange for the provision of accessible formats and communication supports for information when an employee requests it.
- Develop and have in place written processes for the development of individual accommodation plans for employees with disabilities.
- Develop and have in place a return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations.
- Take into account individual accommodation plans when using performance management processes.

- Take into account individual accommodation plans when using career development and advancement processes.
- Take into account individual accommodation plans when using redeployment procedures.
- Providing for emergency and compassionate grounds in the eligibility process.

Completed January 1, 2016

## Future Requirements

The Northwestern Health Unit will continue to improve accessibility of its programs and services through implementing a number of requirements outlined in the AODA Integrated Accessibility Standard (IAS). The following pages list each provision of the standard, and outlines actions planned to meet the provision.

### On-going training of staff

- The Northwestern Health Unit will continue to provide orientation and on-going training to all staff, volunteers, students, contractors and any other person or organization that provides service on behalf of the Northwestern Health Unit and/or participates in developing health unit policies and procedures

## Making the Plan Available to the Public

The 2015 Accessibility Plan is released to the public by posting it to the Northwestern Health Unit website at [www.nwhu.on.ca](http://www.nwhu.on.ca),

The Northwestern Health Unit 2015 Accessibility Plan reports on the actions and progress made to meet the Accessibility for Ontarians with Disabilities Act, 2005 and to identify, prevent, and remove barriers for people with varying abilities.

While the Health Unit is releasing the 2015 Accessibility Plan, the act of identifying and removing barriers is an ongoing activity. Feedback on the accessibility plan and the accessibility of sites and services at the Health Unit is always welcome.

You can provide feedback in the following ways:

- Ask for a Client Feedback Form found in the reception area of any health unit office or on our website at [www.nwhu.on.ca](http://www.nwhu.on.ca). Fill it out and return it to any health unit location.
- Fill out the Client Feedback Survey online at our website at [www.nwhu.on.ca](http://www.nwhu.on.ca). Note that for privacy reasons we do not collect personal information online, so cannot respond to complaints filed online.
- Call the health unit and ask to speak to someone who can fill out a Client Feedback Form for you. They will record your comments and pass them on.

- Write and mail a letter to: Manager, Human Resources  
Northwestern Health Unit  
210 First St N  
Kenora, ON, P9N 2K4
- Download a Client Feedback Form from our website at [www.nwhu.on.ca](http://www.nwhu.on.ca) and mail it to the address above.
- Send an email to [accessibility@nwhu.on.ca](mailto:accessibility@nwhu.on.ca).

Health unit staff will respond to comments or complaints as appropriate and/or upon request within 30 days of the date that the feedback was submitted.

You can get a copy of our policy and procedure on Accessibility & Customer Service Standards in the following ways:

1. Download them from our website at [www.nwhu.on.ca](http://www.nwhu.on.ca).
2. Put your request on the Client Feedback Form available in any health unit office or on our website.
3. Phone the Accessibility Officer at 1-800-830-5978 ext. 3278. The Accessibility Officer is Marilyn Herbacz.
  - E-mail your request to: [accessibility@nwhu.on.ca](mailto:accessibility@nwhu.on.ca).

The Accessibility Plan is available in a number of accessible formats, including electronic copy, text-only, audio, and plain language summary. To request an additional format, please contact the email above.

## Summary

The Northwestern Health Unit as a public service is committed to meeting the accessibility needs of our community. Through the implementation of this plan barriers will be identified, removed, and prevented for people with varying abilities.

The organization will continue to review practices and identify specific needs related to accessibility within the Health Unit.

# Appendix A: General Definitions

## Accessible

Easy to access, use, or understand.

## Accessibility

Accessibility means that the ability of people with disabilities will be enhanced to have equal access to opportunities, live independently and contribute to the community. To be sustainable, accessibility must have long term viability as part of the institution’s systems and culture.

## Barrier

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, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

An example of each of the different kinds of barriers is shown below:

Physical	A doorknob that cannot be operated by a person with limited upper-body mobility and strength.
Architectural	A hallway or door that is too narrow for a wheelchair or scooter.
Information	Typefaces in reports or on the website that are too small to be read by a person with low-vision.
Communication	Sign language interpretation is not available at public meetings.
Attitudinal	A receptionist assumes an individual in wheelchair is not intelligent.
Technological	A paper tray on a laser printer that requires two strong hands to open.
Policy/Practice	A practice of not allowing job applicants an opportunity to complete job testing in alternate formats.

## Disability

The ODA adopts the broad definition for disability that is set out in the Ontario Human Rights Code.

A “disability” is:

- (a) Any degree of physical disability, infirmity, malformation or disfigurement caused by bodily injury, birth defect or illness and includes, but is not limited to:

- 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.
- (b) A condition of mental impairment or a developmental disability;
- (c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (d) A mental disorder; or
- (e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.