

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 1 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

ACCESSIBILITY PROCEDURE

REFERENCES

- NWHU Board of Health Policy – Accessibility
- *Accessibility for Ontarians with Disabilities Act (AODA), 2005.*
- *Accessibility Standards for Client Service (Ontario Regulation 429/07)*
- *Integrated Accessibility Standards (Ontario Regulation 191/11)*

KEY / CRITICAL STEPS

1. The Northwestern Health Unit is committed to meet and if possible exceed the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)*.
2. 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. The Accessibility Plan is:
 - Reviewed and updated at least once every five years.
 - Posted on the company's website.
 - Provided in an alternate / accessible format upon request.
3. The Manager of Human and Financial Resources monitor's the health unit's compliance with the AODA.
4. The Manager of Human and Financial Resources (or designate) completes an online compliance report by the required deadlines.

CUSTOMER SERVICE STANDARDS

5. All health unit staff:
 - Plan and provide programs and services in a manner that:
 - Respects the dignity and independence of people with disabilities.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 2 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

- o Gives people with varying abilities an equitable opportunity to access and benefit from programs and services and to participate in activities and events.
- o Integrates people with disabilities and others unless an alternate method is necessary to enable a person with a disability to obtain, use, or benefit from the programs and services.
- Prepare and amend policies, procedures, and practices where necessary upon release of the additional standards or changes in legislation.
- Provide copies of these policies to clients upon request.
- Provide alternative formats of policies upon request.
- Implement and/or participate in the appropriate training in relation to the customer service standards.
- Provide notice for disruptions in service.
- Collect client feedback.

COMMUNICATION

6. Health unit staff members communicate with individuals who have varying abilities in a manner which takes into account the person's individual needs.
7. **Plain language** – Plain language is used when developing resources, advertisements, and promotional material targeting the general public.
8. **Website** – Within a reasonable time frame the NWHU website and its applications will be created in a way that considers how people with disabilities use assistive devices such as screen readers and speech input systems to operate their computers.
9. **Documents** – Health unit staff provide people with varying abilities service information, forms, or other documents to be provided in an alternate format upon request. Where the health unit is unable to provide the requested format, an explanation is provided to the individual and staff work with the individual to find a suitable alternative.

Alternate formats to consider may include:

- Large print for people with low vision (including adjustable sized print for electronic materials)
- Braille used by some people who are blind or deaf-blind
- Audio formats such as digital recordings on CD's.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 3 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

- Videos that may be helpful to people with certain learning disabilities
- Verbally read materials by a staff member to a person
- Easy-read, simplified summaries of materials

10. **Telephone services** – The NWHU is committed to providing fully accessible telephone services to our clients. Staff who are required to communicate with customers over the telephone are trained to communicate clearly and slowly in plain language.

Where telephone communication is not suitable to an individual’s communication needs, staff offer to communicate with customers by in writing or by Bell relay services.

11. **Conferences and presentations** – Staff arrange for real-time captioning services, sign language interpreters or deaf-blind interveners where possible upon request so that people may participate effectively in conference seminars. These services are identified on promotional material related to conferences or events.

12. **Reception** - Staff will strive to provide accessible services to everyone and communicate by alternate means if necessary. For example staff provide a pen, paper or whiteboard should the individual wish to write down the reason for their visit to the Health Unit.

To better serve clients who are hard of hearing, the staff may provide a pen and paper should the individual wish to write down the reason for their visit to the health unit.

13. **Billing/Records (e.g., immunization record booklet)** – Staff provide invoices or records in the following formats upon request:

- Hard copy in regular or large print (when possible)
- E-mail

Staff answer any questions clients may have about the content of the invoice or records in person, by telephone or email.

WRITTEN COMMUNICATION

14. *Staff use* accessible design standards for all print information for both internal and external audiences.

- The Northwestern Health Unit has adopted the Canadian National Institute for the Blind (CNIB) Clear Print Accessibility Guidelines for its print materials. The guidelines can be found at <http://www.cnib.ca/en/services/resources/Clearprint>.
- There may be exceptions to the above guidelines. These exceptions are discussed in the development phase of the materials.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 4 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

PERSONAL ASSISTIVE DEVICES

15. The Northwestern Health Unit is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our programs, services, events, and activities. The health unit welcomes clients who bring their own assistive devices such as a walker, wheelchair, and oxygen concentrators.
16. Staff work with clients who identify that an assistive device would benefit them in participating with a program, services, events and activities provided by the health unit. Where a client requests a device staff work with their manager or another designated person to facilitate this request.
17. Where the NWHU has or arranges to provide an assistive device on our premises to better assist clients the applicable staff are trained and familiarized with the use of these devices.

SERVICE ANIMALS AND SUPPORT PERSONS

Service animals

18. Guide dogs and other service animals are permitted to accompany people with disabilities on Northwestern Health Unit property and in areas of its buildings that are accessible to the public and other third parties. It is important to remember that Service Animals are working animals. Health Unit staff do not distract or disrupt any service animal by touching, petting or talking to the animal.
19. When planning events and activities, staff make every reasonable effort to choose sites and locations where service animals are not excluded by law.

Support persons

20. People with disabilities may be accompanied by a support person while participating in our programs, services, events, or activities. At no time will people with disabilities who are accompanied by a support person be prevented from having access to his or her support person while on our properties or while attending our events or activities.
21. Where privacy is a concern, staff ask the person with disabilities whether he or she would like his or her support person present.
22. Where a client with disabilities requires assistance with lifting or toileting activities, the client's support person is required to accompany the client.
23. When planning events, support persons are not charged admission fees for Health Unit events.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 5 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

DISRUPTION OF SERVICE

24. Staff provide notice to the public when there is a planned or unexpected disruption of access to health unit facilities or services that may be used by people with disabilities. These facilities, services, or systems include:

- Elevators
- Accessible washrooms and clinic rooms
- Ramps
- Mechanical doors

25. This notice:

- includes the nature of the disruption, the reason for it, its expected duration, and a description of alternative facilities or services, if available.
- Is placed in writing at all building entrances, by the reception desk, and by the disrupted facility or service location. The notice will be placed at a height that will allow a person using a wheelchair to read it.
- Is also posted on the health unit website or announced publically as soon as the disruption and pertinent details are available.

26. Disruption of service notices are developed and posted with support from the Communications team.

MANDATORY STAFF TRAINING

27. 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 are provided with training on accessibility and customer service standards.

28. All employees, students and volunteers complete online training on accessibility and customer service standards as part of their orientation and every two years thereafter.

- Additional training may be provided for individuals who work in certain programs or team areas as needed including instruction on how to use equipment and assistive devices available.

29. Managers ensure that staff have completed training requirements according to prescribed schedules.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 6 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

30. Staff are made aware of any amendments made to policies due to changes in legislation or where new process or program is developed.

31. Training content includes:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- Training on NWHU policies, practices, and procedures and a review of the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with varying abilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the equipment or assistive devices (wheelchair, exterior ramp, elevator) currently available on health unit premises or other ways that may help with the provision of goods or services to people with disabilities
- What to do if a person with a disability is having difficulty accessing the health unit's programs, services, events, and activities.

32. **Contracting Services** – In circumstances where the NWHU is contracting services of an individual or organization that is in direct contact with the public on behalf of the appropriate manager requires the individual or organization to review and understand NWHU policies, procedures and practices and provide:

- Evidence that the contract service company has provided the training required under the customer service standard of the Act to the employees it has deployed in our service; or
- Have the employees of the contracted organizations who work on our premises attend a training opportunity through the NWHU.

33. The Human & Finance Services team maintains records of all training provided.

CLIENT FEEDBACK AND QUESTIONS

34. The Northwestern Health Unit is committed to meeting and surpassing the service expectations of all its clients, including people with disabilities. Feedback and comments are welcome and appreciated and help the health unit to improve customer service.

35. Clients, including people with disabilities, can provide feedback about the way the health unit provides goods and services in the following ways:

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 7 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

- Ask for a client satisfaction / feedback survey found in the reception area of any health unit office. Fill it out and return it to any health unit location.
- Fill out the client satisfaction / feedback survey on our website at 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 satisfaction / feedback survey for you. They will record your comments and pass them on.
- Write and mail a letter to:

Manager, Foundations
Northwestern Health Unit
396 Scott St
Fort Frances, ON, P9A 1G9
- Download a client satisfaction / feedback form from our website at www.nwhu.on.ca and mail it to the address above.
- Send an email to talkpublichealth@nwhu.on.ca.

36. All feedback submitted is directed to the Manager of Foundations.
37. Complaints are documented in an online complaints system and forwarded to the appropriate manager or other senior staff to be addressed.
38. 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.
39. Information about the feedback process and availability of documents is made available to the public on the NWHU website, in person, by telephone, in writing or email.
40. The Manager of Foundations prepares a written summary of all client feedback at least annually. The report is provided to the Chief Executive Officer, the Medical Officer of Health and the Board of Health.
41. The Manager of Foundations (or designate) maintains records of all feedback received, consistent with privacy and records retention guidelines.

EMPLOYMENT STANDARDS

Recruitment

42. The Northwestern Health Unit notifies employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 8 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

Recruitment, Assessment or Selection Process

43. Human Resources staff notify 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.
44. If a selected applicant requests an accommodation, Human Resources staff 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.

Notice to Successful Applicants

45. When making offers of employment, Human Resources staff notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

46. The Northwestern Health Unit continues to inform employees of 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.

Individual accommodation plan

47. The Northwestern Health Unit is committed to working with any employee who requires accommodation in day-to-day activities and emergency situations in accordance with the *Accessibility for Ontarians with Disabilities Act (AODA)* and the *Ontario Human Rights Code*. There is a formal written process for the development of documented individual accommodation plans as well as emergency individual response plan for employees with varying abilities.
48. *Disability* as defined by AODA:
 - Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness.
 - A condition of mental impairment or a development disability
 - A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
49. Upon request by any employee, Human Resource staff develop an individual accommodation plan in collaboration with the employee based on the individuals' needs.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 9 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

50. Upon request by any employee, Human Resource staff develop an individual response plan for emergency to ensure all employees are safe during in an emergency situation.

Responsibilities

51. The *Employer* will make every reasonable effort to accommodate employees on an individual basis due to an employee's disability.

52. The *Employee* will:

- Notify their Manager of the request for an individual accommodation plan.
- Participate in the development of the accommodation plan.
- Provide sufficient medical documentation as determined by the employer related to the accommodation.
- Participate in an annual meeting to review the plan.
- Cooperate throughout the process and identify if there are any changes or updates needed to the plan.
- If necessary complete the Employee Emergency Information Worksheet (see below).

53. *Human Resources* will:

- Assist in developing an individual accommodation plan based on the documented functional abilities of the employee:
- Request the employee be evaluated by an outside medical agency or physician or other expert if necessary, which may be at the employee's expense, to assist in determining accommodation.
- Meet with the employee, the relevant Manager, and other workplace representative necessary to develop the plan.
- Provide the accommodation plan in a format that considers the accessibility needs of the employee.
- Retain the accommodation plan on the employee's personnel file.
- Review the plan with the employee and the relevant Manager at least annually or when necessary.

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 10 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

54. The *Manager/Supervisor* will:

- Participate in the development of the individual accommodation plan.
- Implement, manage and evaluate the accommodation plan once developed.
- Communicate with those needed to implement and manage the plan.
- Participate in the yearly review of the plan.

Emergency Individual Response Plan

55. Any person who has a documented accommodation plan with Northwestern Health Unit completes an "Individualized Employee Emergency Response Information" form when necessary. This is to ensure that the health unit provides an Emergency Response Plan in a format that takes into consideration individual needs.
56. This worksheet focuses on any potential emergency response barriers someone with varying abilities might face as well as other pertinent information the organization will need to know in order to ensure the individual is safe in an emergency situation.
57. Health unit managers, Human Resource staff and others deemed necessary will work with each individual to ensure that all areas have been covered.

Accessible Formats and Communication Supports for Employees

58. Upon the request of an employee with a disability, Human Resources staff consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the bona fide requirements of his/her job, and information that is generally available to other employees.
59. In determining the suitability of an accessible format or communication support, Human Resources staff consult with the employee making the request.

Return to Work Process

60. The Northwestern Health Unit maintains a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.
61. The return to work process outlines the steps the Northwestern Health Unit will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.
62. This return to work process does not replace or override any other return to work process created by or under any other statute (i.e., the *Workplace Safety Insurance Act, 1997*).

Northwestern Health Unit Policies & Procedures		Number:
Manual:	Corporate Administration PROCEDURE Manual	
Section:	I, General	Page 11 of 11
Title:	Accessibility Procedure	

Approved by:	Chief Executive Officer	Approval Date:	Feb. 23/12
Revision Dates:	Nov. 21/14		

Performance Management, Career Development and Advancement & Redeployment

63. The Northwestern Health Unit takes into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Approved / Revised: Original signature on file