

**CORPORATE MANUAL**

<b>TITLE:</b> Accessibility Policy - Integrated Accessibility Standards 191/11	<b>NUMBER:</b> 1-406
<b>SECTION:</b> Introduction	<b>RESPONSIBLE DISCIPLINES:</b> All staff and Physicians
<b>DATE:</b> December 2012	<b>APPROVED BY:</b> Vice President, Finance & Corporate Services
<b>REVIEW FREQUENCY:</b> Every 3 Years	<b>Policy:</b> X <b>Standard:</b> X
<b>REVISED/REVIEWED:</b> December 2013, June 2015	<b>Guideline:</b> <b>Procedure:</b>

**Policy:**

Cambridge Memorial Hospital (CMH) will meet the needs of persons with disability/disabilities in a timely manner as prescribed by the Accessibility for Ontarians with Disabilities Act, 2005 and its associated Standards in accordance with the CMH Vision, Mission and Values. This policy builds on the Cambridge Memorial Hospital Accessibility Policy - Customer Service Standard [Accessibility Policy](#)

**Definitions:**

Please refer to [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#) for definitions pertinent to this policy

**Standards:**

**Integrated Accessibility Standards: Part I General**

- General (by Jan 1, 2013)
  - o Policies and procedures are in a written format and available to the public, in a format agreed upon with the person with a disability.
  - o The requirements set out in this Regulation are not a replacement or a substitution for the requirements established under the *Human Rights Code* nor do the standards limit any obligations owed to the persons with disabilities under any other legislation
- Multi-year accessibility plan (by Jan 1, 2013)
  - o A Multi-Year Accessibility Plan (MYAP) that will outline the strategy to prevent and remove barriers and meet the requirements of this legislation will be established, implemented and maintained.
  - o The MYAP will be posted on the CMH website and available to the public in a format agreed upon with the person with a disability
  - o The MYAP will be reviewed and updated at least once every five years in consultation with persons with disabilities and in consultation with the Accessibility Committee

Accessibility Policy -Integrated Accessibility Standards 191/11

Corporate Manual

Cambridge Memorial Hospital

September 30, 2015

Page 1 of 7

- An annual status report on the progress of measures taken to implement the strategy referenced in the MYAP and will post this report on the CMH website and make the report available in an agreed upon format upon request
- Procuring or acquiring goods, services or facilities (by Jan 1, 2013)
  - CMH will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable.
  - Where not practicable CMH shall provide, upon request, an explanation
- Self-service kiosks (by Jan 1, 2014)
  - CMH will incorporate accessibility features when designing, procuring or acquiring self- service kiosks.
  - Under this legislation ‘kiosk’ means an interactive electronic terminal, including point of sale device, intended for public use that allows users to access one or more services or products or both
- Training (by Jan 1, 2014)
  - CMH will ensure staff and volunteers are trained in the requirements of the accessibility standards referred to in Regulation 191/11 and on the *Human Rights Code* [Human Rights Code, R.S.O. 1990, c. H.19](#) as it pertains to persons with disabilities including:
    1. Those who participate in developing the organization’s policies and
    2. All other persons who provide goods, services or facilities on behalf of the organization
    3. The training will be appropriate to the duties of the employee, volunteer and other persons
    4. The training will be delivered as soon as practicable
  - CMH will provide training in respect of any changes to the policies on an ongoing basis
  - A record of training will be maintained including the dates on which the training is provided and the number of individuals to whom it is provided

### **Integrated Accessibility Standards: Part II Information and Communication Standards**

- Definitions and Exceptions
  - CMH will comply with the definitions and exceptions outlined in 9.(1) (2) (3) as found in the Regulation at [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11 updated link](#)
- Feedback (by Jan 1, 2014)
  - CMH will ensure that processes for receiving and responding to feedback shall be accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request
  - CMH will continue to support the requirements for feedback as prescribed under section 7 of the Ontario Regulation 429/07

Accessibility Policy -Integrated Accessibility Standards 191/11

Corporate Manual

Cambridge Memorial Hospital

September 30, 2015

Page 2 of 7

- (Accessibility Standards for Customer Service)
- CMH will notify the public of available accessible formats and communication supports
  - Accessible Formats and Communication Supports (by Jan 1, 2015)
    - Except as otherwise provided, CMH shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,
      1. In a timely manner that takes into account the person's accessibility needs due to disability and
      2. At a cost that is no more than the regular cost charged to other persons.
      3. CMH shall consult with the person making the request in determining the suitability of an accessible format or communication support
    - CMH will notify the public about the availability of accessible formats and communication support
  - Emergency procedure, plans or public safety information (by January 1, 2012)
    - Any Emergency procedures, plans or public safety information available to the public shall be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.
  - Accessible websites and web content
    - CMH will make internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A (by January 1, 2014)
    - and increasing to WCAG 2.0 Level AA, other than,
      1. success criteria 1.2.4 Captions (Live) and
      2. success criteria 1.2.5 Audio Descriptions (Pre-recorded) (by January 1, 2021)
    - Except where meeting the requirement is not practicable, this section applies,
      1. To websites and web content, including web-based applications, that CMH controls directly or through a contractual relationship that allows for modifications of the product and
      2. To web content published on a website after January 1, 2012
      3. The determination of practicability in relationship to this Regulation is described in S 14(6)(a) and (b) [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#)
      4. Definitions pertaining to this section are describe in S (7) [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#)
  - Educational Training and Resources and materials, etc.
    - CMH is not an obligated organization under the definitions in Schedule 1 Broader Public Sector. Examples of obligated organizations are Colleges and Universities

**Integrated Accessibility Standards: Part III Employment Standards** (by January 1, 2014)

- Scope and Interpretation

- CMH supports the application of this section in relation to its employees; this section does not apply to volunteers
- CMH Human Resources (HR) will update its policies, procedures and practices to ensure compliance with Regulation 191/11 Part III Employment Standards.
- Recruitment General
  - CMH will notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.
- Recruitment, assessment or selection process
  - During recruitment CMH Human Resources department shall through consultation with an individual requesting an accommodation, arrange for the provision of suitable accommodation, in a manner that takes into account the applicant’s accessibility needs due to disability.
- Notice to successful applicants
  - Human Resources shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.
- Informing employees of supports
  - Human Resources shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, the provision of job accommodations that take into account an employee’s accessibility needs due to disability.
    1. This communication will occur as soon as practicable to new employees after commencement of employment.
    2. Updated information will be shared with 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.
- Accessible formats and communications supports for employees
  - Where an employee so requests it, CMH will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,
    1. Information that is needed in order to perform the employee’s job; and
    2. Information that is generally available to employees in the workplace.
  - Consultation with the employee will occur to determine the suitability of an accessible format or communication support
- Workplace emergency response information (by January 1, 2012)
  - Individual emergency response information will be provided 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
  - If the employee with the disability requires assistance and with the employee’s consent, the workplace emergency response information will be shared with the person designated by the employer to provide assistance to the employee.
  - This information will be provided to the employee and designate as soon as

- practicable after the employer becomes aware of the need for accommodation due to the employee's disability.
- This information will be reviewed by Human Resources and with the manager of the employee with a disability,
    1. When the employee moves to a different location within the organization
    2. When the employee's overall accommodations needs or plans are reviewed; and
    3. When the employer reviews its general emergency response policies.
  - Documented individual accommodation plans
    - CMH will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities
    - The process for the development of documented individual accommodation plans shall include the following:
      1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan
      2. The means by which the employee is assessed on an individual basis
      3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employers expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
      4. The manner in which the employee can request the participation from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
      5. The steps taken to protect the privacy of the employee's personal information
      6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
      7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
      8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability
    - The individual accommodation plan shall include:
      1. If requested, any information regarding accessible formats and communication supports provided as described under "Accessible formats and communications supports for employees" in this policy
      2. Identify any other accommodation that is to be provided
  - Return to Work Process
    - CMH Human Resources,
      1. 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-related accommodations in order to return to work, and
    - 2. Shall document this process.
  - The return to work process shall,
    - 1. 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
    - 2. Use documented individual accommodation plans, as described above, as part of the process.
  - The return to work process referenced here does not replace or override any other return to work process created by or under any other statute.
- Performance Management
  - The performance management process shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using the performance management tool
- Career development and advancement
  - The needs of the employee with disability/disabilities and any individual accommodation plans shall be taken into account when providing career development and advancement to its employees with disabilities.
  - ‘career development and enhancement’ includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another that may be higher in pay, provide greater responsibility or be at a higher level in the organization, or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.
- Redeployment
  - The accessibility needs of the employees with disabilities, as well as an individual accommodation plan shall be taken into account when redeploying employees with disabilities.
  - “Redeployment” means 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.

#### **Integrated Accessibility Standards: Part IV. Transportation Standards**

- This section is not applicable to Cambridge Memorial Hospital

#### **Integrated Accessibility Standards: Part IV.I Design of Public Spaces Standards (Accessibility Standards for the Built Environment) (by January 1, 2016)**

- Application
  - Except as otherwise specified, this Part applies to public spaces that are newly constructed or redeveloped on and after the dates January 1, 2016
- The legislation provides application, general obligation and technical requirements for the construction/renovation of outdoor public use eating areas on hospital grounds; exterior paths of travel including ramps, stairs, curb ramps, depressed curbs, and rest areas; accessible parking and obtaining services including service counters, fixed

queuing guides and waiting areas

**References:**

Accessibility for Ontarians with Disabilities Act, 2005

[http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_05a11\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm)

Accessibility for Ontarians with Disabilities Act, 2005 Integrated Accessibility Standard  
191/11 [Accessibility for Ontarians with Disabilities Act, 2005 - O Reg 191-11](#)

Human Rights Code [Human Rights Code, R.S.O. 1990, c. H.19](#)

Cambridge Memorial Hospital Accessibility Policy [Accessibility Policy](#)

**Developed in consultation with:**

- Accessibility Committee
- Human Resources
- Information Management Technology
- Purchasing Department