

# Accessibility Multi-Year Plan

December 2013

## Public Health Ontario

Public Health Ontario is a Crown corporation dedicated to protecting and promoting the health of all Ontarians and reducing inequities in health. Public Health Ontario links public health practitioners, frontline health workers and researchers to the best scientific intelligence and knowledge from around the world.

Public Health Ontario provides expert scientific and technical support to government, local public health units and health care providers relating to the following:

- communicable and infectious diseases
- infection prevention and control
- environmental and occupational health
- emergency preparedness
- health promotion, chronic disease and injury prevention
- public health laboratory services

Public Health Ontario's work also includes surveillance, epidemiology, research, and professional development and knowledge services. For more information, visit [www.publichealthontario.ca](http://www.publichealthontario.ca).

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# Commitment Statement

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Public Health Ontario (PHO) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under the [Accessibility for Ontarians with Disabilities Act \(AODA\)](#) and applicable regulations.

Under the AODA and applicable regulations, the following standards are applicable to PHO:

- Customer Service
- General Requirements
- Information and Communications
- Employment.

## Customer Service Standard

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### **Commitment:**

Since 2010, PHO has been in compliance with the Customer Service Regulation under the AODA and will continue to comply with the regulation.

PHO is committed to excellence in serving all members of the public, including persons with disabilities, and it will carry out its functions in a manner which delivers accessible service to all members of the public.

PHO is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities have equitable services and access to our goods and services, in the same place and in a similar way as other members of the public.

### **Action Taken:**

The following measures have been implemented by PHO:

- Providing education to all persons who, on behalf of PHO, deal with the public or other third parties, provide services to the public, or are involved in the development and approvals of members of the public service policies, practices, and procedures, in order to provide the best possible service to all members of the public, including persons with disabilities
- Ensuring staff are trained and familiar with various assistive devices that may be used by members of the public with disabilities who are accessing PHO's goods or services
- Tracking and recording accessibility training

- Offering to communicate with members of the public by alternate means and formats if telephone communication is not suitable to their needs
- Ensuring members of the public who use assistive devices or supports can use or benefit from our goods and services
- Providing members of the public with notice in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances and service counters on PHO premises and, when applicable, publishing on the PHO web site
- Ensuring the design and delivery of events and activities will be accessible to any member of the public and any products related to the event will be provided in an alternate format upon request
- Committing to provide any goods produced by PHO (e.g., reports, learning materials) in alternate formats and media to meet the needs of individuals upon request
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels
- Providing PHO's Customer Service accessibility policy in an appropriate accessible format upon request
- Reporting compliance with the members of the Customer Service Standard on the Accessibility Compliance Reporting tool at [Service Ontario's One-Source for Business](#) website.

**Required legislative compliance: January 1, 2010**

**Status: Completed**

## General Requirements

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### PROCURING OR ACQUIRING GOODS, SERVICES OR FACILITIES

**Commitment:**

PHO is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so.

**Action Taken:**

In accordance with the Integrated Accessibility Standard Regulation (IASR), PHO has implemented procurement processes that:

- Use accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so
- Will provide an explanation upon request in instances where PHO has decided that it is not practicable to incorporate accessibility criteria and features

- Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.

**Required legislative compliance: January 1, 2013**

**Status: Completed**

## TRAINING

### **Commitment:**

PHO is committed to implementing a process to ensure that all employees and students who provide goods, services, and facilities on PHO's behalf, and persons participating in the development and approval of PHO's policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

### **Action Taken:**

In accordance with the IASR, PHO will:

- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees and students who provide goods, services, and facilities on PHO's behalf, and persons participating in the development and approval of PHO's policies
- Ensure that the training is provided to persons referenced above as soon as practicable. This will normally take place in Corporate Orientation Sessions.
- Ensure training is updated as changes occur and all individuals listed above are advised of the updates
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

**Required legislative compliance: January 1, 2014**

**Status: Completed**

# Information and Communication Standard

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## FEEDBACK, ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

### **Commitment:**

PHO is committed to making company information and communications accessible to persons with disabilities. PHO will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

### **Planned Action:**

In accordance with the IASR, PHO will:

- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner and at no additional cost
- More broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
  - Provide or arrange for the provision of such accessible formats and communication supports
  - Consult with the person making the request to determine the suitability of the accessible format or communication support
  - Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into an account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons
  - Notify the public about the availability of accessible formats and communication supports.

**Required legislative compliance: January 1, 2014 – Feedback**  
**January 1, 2015 – Information Accessible**

**Status: Completed**

## ACCESSIBLE WEBSITES AND WEB CONTENT

### Planned Action:

In accordance with the IASR, PHO will:

- Ensure PHO's public website [www.publichealthontario.ca](http://www.publichealthontario.ca) is compatible with third party accessibility software; accessible alternate versions can be provided if technology permits
- Ensure AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives
- Make our websites and web content accessible according to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0
- Make public emergency information accessible when requested.

### Required Legislative Compliance:

**January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content**

**January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except where meeting the above-mentioned requirements is not practicable due to, among other things, (a) the availability of commercial software or tools or both and (b) significant impact on an implementation timeline that was planned or initiated before January 1, 2012.**

**Status: January 1, 2014, requirements – Completed**

**January 1, 2021 – In progress**

## Employment Standard

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## WORKPLACE EMERGENCY RESPONSE INFORMATION

### Commitment:

Where PHO is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### Action Taken:

The following measures were implemented by PHO:

- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required



- Workplace Emergency Response Information plans have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities
- Where required, PHO provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees
- These individualized emergency plans have been communicated to the employees' respective managers and appropriate Health and Safety members (i.e., Building Fire Warden), on an "as needed" basis
- On an ongoing and regular basis, and as per the applicable terms of the IASR, PHO will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

**Required legislative compliance: January 1, 2012**

**Status: Completed**

## RECRUITMENT

### **Commitment:**

PHO is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

### **Action Taken:**

In accordance with the IASR, PHO will conduct the following:

- PHO will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process
- Review and modify existing recruitment policies, procedures, and processes, as necessary
- Indicate that accommodation is available for applicants with disabilities, on PHO's website and on job postings
- Work with suppliers to ensure external Web pages are compliant with the Information and Communication Standards under the IASR's requirements
- PHO will 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 in the assessment/selection process. This will include:
  - Inclusion of availability of accommodation notices as part of the script in the scheduling of an interview and/or assessment
  - Provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability, if a selected applicant requests an accommodation
- When making offers of employment, PHO will notify the successful applicant of its policies for accommodating employees with disabilities. When accommodation is required, PHO will develop

a workplace accommodation plan in accordance with PHO's Workplace Accommodation and Return to Work policy and Flexible Work Arrangements Policy.

**Required legislative compliance: January 1, 2014**

**Status: Completed**

## INFORMING EMPLOYEES OF SUPPORTS

### **Commitment:**

In accordance with the IASR, PHO will inform all employees of policies that support 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 a disability.

### **Action Taken:**

This will include:

- Informing current employees and new hires of PHO's policies supporting employees with disabilities including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability
- Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process
- Keeping employees up to date on changes to existing policies on job accommodations with respect to disability
- Where an employee with a disability so requests it, PHO will provide or arrange for provision of suitable accessible formats and communications supports for:
  - Information that is needed in order to perform the employee's job
  - Information that is generally available to employees in the workplace.
- In meeting the obligations to provide the information that is set out in the paragraph above, PHO will consult with the requesting employee in determining the suitability of an accessible format or communication support.

**Required legislative compliance: January 1, 2014**

**Status: Completed**

## DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS/RETURN TO WORK PROCESS

### Commitment:

PHO will incorporate accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

### Action Taken:

PHO's existing policies include steps that PHO will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

PHO will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

PHO will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- The manner in which the employee requesting accommodation can participate in the development of the plan
- The means by which the employee is assessed on an individual basis
- The manner in which PHO can request an evaluation by an outside medical or other expert, at PHO's expense, to assist PHO in determining if and how accommodation can be achieved
- The manner in which the employee can request participation of a representative from his or her bargaining agent where an employee is in the bargaining unit, or the participation of another representative from the workplace where an employee is not in the bargaining unit
- Protecting the privacy of the employee's personal information
- Outlining the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done
- Including in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs
- If individual accommodation plans are established, ensure that they include:
  - Individualized workplace emergency response information that is required
  - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - Information that is needed in order to perform the employee's job
    - Information that is generally available to employees in the workplace.
- Identify any other accommodation to be provided to the employee.

PHO will ensure that the return to work process as set out in its existing policies outlines the steps PHO will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

**Required Legislative compliance: January 1, 2014**

**Status: Completed**

## PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND REDEPLOYMENT

### **Commitment:**

PHO will 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
- When providing career development and advancement to its employees with disabilities
- When redeploying employees with disabilities.

### **Action Taken:**

In accordance with the IASR, PHO will:

- Review, assess and, as necessary, modify existing policies, procedures, and training to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance
  - managing career development and advancement
  - redeployment is required.
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings.

**Required Legislative compliance: January 1, 2014**

**Status: Completed**

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