

2019  
(Revised)

# AODA Multi-Year Plan



Group Health Centre  
240 McNabb Street  
Sault Ste. Marie, ON  
P6B 1Y5

# Our AODA Initiative: Barrier-Free GHC

---

## Introduction

As Ontario's largest and longest established alternatively funded healthcare organization, Group Health Centre serves over 71,000 Sault Ste. Marie and Algoma District residents. Group Health Centre is a progressive, multi-specialty, ambulatory care health organization and is one of Canada's first consumer-sponsored health care facilities built with private funds donated by local union members. The principles of the Group Health Centre developed over 50 years ago remain today. Our values express our commitment to excellence, innovative management, community governance, and a committed staff.

Group Health Centre is working hard to remove and prevent barriers to accessibility for its patients, clients, employees and volunteers. As the community's leading healthcare organization it is imperative that we are advocates for accessibility and create an equal opportunity environment for everyone by providing alternative formats and accommodations whenever possible.

## About GHC's Multi-Year Accessibility Plan

The Accessibility for Ontarians with Disabilities Act (AODA) addresses a history of discrimination of individuals with disabilities by ensuring that individuals with disabilities have equal access to goods, services, facilities, accommodations, building structures and premises. The Act requires that Ontario be accessible to individuals with disabilities by 2021. The following five key areas of the related standards were developed with involvement of Ontarians with disabilities and are phased in over a 20 year period:

- Customer Service
- Built Environment
- Information & Communications
- Transportation
- Employment

Group Health Centre is committed to providing quality services that are accessible to all as we believe in the intrinsic worth of everyone – our employees, patients, clients, volunteers, and visitors. We are dedicated to fostering a supportive environment for those with disabilities.

In order to meet the unique needs of each person each and every day, as well as our legal obligations under the Accessibility for Ontarians with Disabilities Act, Group Health Centre has a Multi-Year Plan that will result in new policies, organization-wide training, and organizational practices associated to each accessibility standard.

Under the AODA, private and not-for-profit organizations with 50 or more employees, such as GHC, must create a Multi-Year Accessibility Plan, accessibility policies, and must satisfy a number of other requirements. The GHC Multi-Year Accessibility Initiative, Barrier-Free GHC, is a plan that sets out the work that GHC has already done to ensure that it offers accessible services and work environments, and describes the work that needs to be accomplished in order to transform itself into an accessible organization according to the legislated requirements. This 2014-2021 accessibility plan outlines the policies GHC has put in place and the actions it has taken to improve opportunities for people accessibility needs.

### Statement of Commitment

Group Health Centre is committed to making every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity. GHC will work to prevent, identify, and remove barriers that impede the ability of people with disabilities to access care and services. This includes patients, employees, physicians, volunteers, and members of the community.

### Multi-Year Plan

#### Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Deadline
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	An Accessibility Policy has been developed and implemented. Group Health Centre is committed to accessibility and demonstrates that commitment by preventing, identifying and removing barriers that impede accessibility for persons with disabilities.	Compliant	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, a) Establish, implement, maintain and document a Multi-Year Accessibility	This document is the multi-year plan which outlines Group Health Centre’s strategy and associated initiatives to prevent and remove barriers. This plan will be reviewed and	Compliant	January 1, 2014

		Pan , which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;	updated as required to ensure continued compliance, at minimum on an annual basis.		
		b) Post the accessibility plan on GHC website and provide the plan in an accessible format upon request;	Multi-Year Accessibility Plan is posted on the GHC website.		
		c) Review and update the accessibility plan at least once every five years.	While the requirement is to review and update the Multi-Year Accessibility Plan every 5 years, the GHC Accessibility Committee will review the Plan at least annually to ensure accuracy and compliance. <i>Next Review: September 2015</i>	Compliant	January 1, 2014
7	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	In line with the Integrated Accessibility Standards Regulation, GHC has provided mandatory online training on the Customer Service Standard to all new and existing employees and continues to train each new hire as part of the onboarding process.  By January 1, 2015 training on the Information and Communications Standard, the Employment Standard, and the Ontario Human Rights Code as it pertains to persons with disabilities will have been provided. This training will pertain to all individuals identified in 7.(1).	Compliant	January 1, 2015

## PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	A “Feedback and Document Request Process” is live on GHC’s website. In addition, there is a statement indicating that documents are available in various accessible formats upon request.	Compliant	January 1, 2015
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request, provide, or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person’s accessibility needs due to disability; and	GHC is committed to providing customer service in a manner that respects the dignity, independence, integration and equal opportunity and actively solicits feedback and comments via the website to ensure individual accessibility needs are met in a timely manner. In addition, there is a statement on our website’s Accessibility page indicating that documents are available in various accessible	Compliant	January 1, 2016

		<p>b) at a cost that is no more than the regular cost charged to other persons.</p> <p>12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>formats upon request. Should an accessible format request be made by an individual, GHC will consult with the person to identify a format and/or support that meets their needs.</p>		
13	Emergency Procedures, Plans or Public Safety Info	<p>13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p>	<p>GHC has implemented Individualized Emergency Response Plans and an Employee Request for Emergency Assistance Form, which applies to all employees only and, as such, is only available on the intranet, with an associated procedure, and not our corporate website.</p>	Compliant	January 1, 2012
14	Accessible Websites & Web Content	<p>14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.</p>	<p><b>January 1, 2014</b> – GHC corporate website conforms to WCAG 2.0 Level A standards.</p> <p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded). Work on this is underway.</p>	<p>January 2014 compliance requirement complete.</p> <p>January 1, 2021 compliance requirement in progress.</p>	<p><b>January 1, 2014 and January 1, 2021</b></p> <p>N/A</p>

### PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	<p>22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</p>	<p>In 2015, GHC updated all job postings, the corporate careers website, and the intranet to notify potential internal and external applicants about the availability of recruitment-related accommodations for disabilities.</p>	Compliant	January 1, 2016
23	Recruitment, Assessment or	<p>23.(1) During a recruitment process, an employer shall notify job applicants,</p>	<p>In 2015, GHC updated all job postings, the corporate careers website, and the intranet to</p>	Compliant	January 1, 2016

	<b>Selection Process</b>	<p>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.</p> <hr/> <p>(2) If a selected applicant requests an accommodation, the employer shall 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.</p>	<p>notify potential internal and external applicants about the availability of recruitment-related accommodations for disabilities. GHC will make suitable accommodations in consultation with the candidate. E.g. When inviting candidates in for an interview, as standard practice, we will ask if they require any accommodation for the interview or testing.</p>		
24	<b>Notice to Successful Applicants</b>	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<p>In 2015, GHC refreshed policies and procedures relating to accommodation for reason of disability, including its Accessibility Policy. GHC's successful candidates are notified of the company's policies for accommodating employees with disabilities. This notification language will be formalized within candidate offer letters.</p>	Compliant	<b>January 1, 2016</b>
25	<b>Informing Employees of Supports</b>	<p>25.(1) Every employer shall inform its employees of its policies used to support its 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 disability.</p> <p>25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>25.(3) Employers shall provide updated information to its 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.</p>	<p>In order to ensure a fair and consistent approach when an employee experiences an injury or illness, GHC maintains a Disability Management Program/Return to Work Program, and associated policies and procedures, which are designed to promote employee health and recovery through early intervention and active case management. In 2015, GHC reviewed/refreshed policies and procedures relating to accommodation for reasons of disability in the context of these Programs.</p> <p>Our practice is to inform new hires of our Programs and associated policies and procedures within the first week of employment. Updates resulting from the 2015 refresh have been promptly communicated to all employees through our internal communication channels and through their direct managers or supervisors.</p>	Compliant	<b>January 1, 2016</b>
26	<b>Accessible Formats &amp; Communication Supports for Employees</b>	<p>26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication</p>	<p>In 2015, GHC reviewed/refreshed policies and procedures relating to accessible communication, including its Accessibility Policy. GHC established a process to consult with employees with disabilities to determine which accessible formats or communication</p>	Compliant	<b>January 1, 2016</b>

		<p>supports for,</p> <ul style="list-style-type: none"> <li>(a) information that is needed in order to perform the employee's job; and</li> <li>(b) information that is generally available to employees in the workplace.</li> </ul> <p>26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>supports they require.</p>		
27	<b>Workplace Emergency Response Information</b>	<p>27.(1) Every employer shall provide individualized workplace emergency response information 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.</p> <p>(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> <li>(a) when the employee moves to a different location in the organization;</li> <li>(b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>(c) when the employer reviews its general emergency response policies.</li> </ul>	<p>GHC has implemented Individualized Emergency Response Plans and an Employee Request for Emergency Assistance Form, all of which are available on the intranet along with an associated procedure.</p>	Compliant	January 1, 2012

28	Documented Individual Accommodation Plans	<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative 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.</li> <li>5. The steps taken to protect the privacy of the employee's personal.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due</li> </ol>	<p>GHC maintains a Disability Management Program/Return to Work Program, that specifically responds to legislative obligations and incorporate best practices in accommodating employees with disabilities and/or with other applicable illnesses or injuries. All stakeholder responsibilities are clearly documented in these Programs, and each accommodation is developed through an individualized planning process.</p> <p>GHC's approach to documenting individual accommodation plans has been reviewed in 2015 to ensure explicit alignment with the specific requirements of Regulation 28.</p>	Compliant	January 1, 2016
----	---	---	---	-----------	-----------------



		to disability.			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) 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</p> <p>(b) shall document the process.</p> <p>29. (2) The return to work process shall,</p> <p>(a) 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</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<p>GHC has created and implemented a detailed Return to Work Program that supports stakeholders in successful accommodations. This includes how accommodations are requested, supporting documentation required to create an individual accommodation plan, how this information is kept private, when medical information is required and the purpose of such information, and the frequency in which the plans will be reviewed. GHC's approach to Return to Work Process has been reviewed in 2015 to ensure explicit alignment with the specific requirements of Regulation 29.</p>	Compliant	January 1, 2016
30	Performance Management	<p>30.(1) An employer that uses performance management in respect of its employees shall 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.</p>	<p>The GHC management team has been educated on knowing how to determine whether accessibility adjustments are required to support an employee with a disability in succeeding; and on making performance management documents available in accessible formats such as large print when asked.</p>	Compliant	January 1, 2016
31	Career Development & Advancement	<p>31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<p>GHC will provide employees at time of registration a training confirmation in which they are requested to inform Learning &amp; Development of any accommodation they require.</p>	Compliant	January 1, 2016

32	<b>Redeployment</b>	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	In 2015, GHC reviewed/refreshed policies and procedures relating to accommodation for reasons of disability, including its Accessibility Policy. Following this refresh, notification language about accessibility needs will be formalized within employee appointment or re-assignment letters for redeployed employees.	Compliant	<b>January 1, 2016</b>
----	---------------------	--	--	-----------	------------------------