



London Health Sciences Centre

## Multi-Year Accessibility Plan Status Update

Submitted by LHSC's Accessibility Working Group

December 2019

# Summary

At London Health Sciences Centre (LHSC) we are committed to improving access to our facilities and services for patients, their families, employees, physicians, students, volunteers and visitors.

Guided by our Organizational values of Compassion, Teamwork, Curiosity and Accountability, our Patient Declaration of Values of Respect, Quality and Compassion in addition to the principles of the Accessibility for Ontarians with Disabilities Act (AODA) we continue to work towards eliminating barriers at LHSC. This specifically aligns with LHSC’s primary strategic value that “Patients are at the centre of everything we do”.

Since 2003, London Health Sciences Centre has prepared annual accessibility plans that address physical, informational, communicational, attitudinal, technological and policy barriers as required under the [Ontarians with Disabilities Act 2001](#), (ODA). Effective December 1<sup>st</sup>, 2015, the ODA requirement to develop annual accessibility plans was repealed as it is now addressed under the AODA multi-year plans.

The AODA (June, 2005) requires hospitals to implement specific policies, procedures and plans which will contribute to making hospitals fully accessible by 2025. As of January 1<sup>st</sup>, 2013, a multi-year accessibility work plan has been prepared that addresses the [Integrated Accessibility Standards Regulations](#) (IASR) under the AODA. Documents related to the regulation are available upon request.

LHSC’s plan will:

- Outline the applicable Integrated Accessibility Standards Regulations and LHSC’s plan to meet the regulations for the upcoming years
- Outline the status of LHSC’s compliance with applicable Integrated Accessibility Standard Regulations

## Future Reporting Schedule

By:	LHSC will:
Dec 31, 2019	File an Accessibility Compliance Report
Jan 1, 2021	Make all websites and web content accessible
Dec 31, 2021	File an Accessibility Compliance Report
Dec 31, 2023	File an Accessibility Compliance Report
Jan 1, 2025	File an Accessibility Compliance Report

## LHSC Accessibility Working Group:

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## Integrated Accessibility Standards Regulations Work Plan - Status Update

AODA Requirement	Deliverable	Activities	Compliance Date	Annual Status Update as of Dec, 2019
<b>General</b>				
Reg. 191/11 s.3 Establish Policies	Implement policy on achieving accessibility within organization	Policy established and posted, provided in an accessible format upon request.	January 1st, 2013	Completed. <b>Reviewed Dec 2019</b>
Reg. 191/11 s.4 Accessibility Plan	Establish & implement multi-year accessibility plan, meeting requirements under the regulation. Post the plan on website. Review and update the accessibility plan at least once every 5 years. Review and update plans in consultation with persons with disabilities.	Create plan, involving applicable departments and Accessibility Working Group as well as advisors with disabilities or caregivers with disabilities. Post on website. Provide report in an accessible format upon request. Post status report on website.	January 1st, 2013	Completed. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 5 Procuring or acquiring goods, services or facilities	Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities.	HMMS reminds all staff when making purchases to consider accessibility criteria. All RFP documentation has AODA compliance as a consideration.	January 1st, 2013	Completed. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 6 Self-Service Kiosks	Incorporate accessibility features when designing, procuring or acquiring self-service kiosks.	HMMS reminds all staff when making purchases to consider accessibility criteria. All RFP documentation has AODA compliance as a consideration.	January 1st, 2013	Completed. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 7 Training	Provide training on the requirements of accessibility standards and on Human Rights Code as it pertains to persons with disabilities.	Through e-learning modules, train all employees and volunteers.	January 1st, 2014	On-going. <b>Reviewed Dec 2019</b>

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<b>Information and Communication Standards</b>				
Reg. 191/11 s. 11 Feedback	Ensure processes for receiving and responding to feedback are accessible to persons with disabilities, upon request. Notify public about the availability of accessible formats.	Post on website the availability of accessible formats for receiving and responding to feedback. Upon request, and in consultation with requester, accommodate process for receiving and responding to feedback. Additional "Provide Feedback" link incorporated into external website.	January 1st, 2014	Completed for both internal and external feedback. <b>Reviewed Dec 2019</b>
Reg. 191/11 s.12 Accessible Formats and Communications supports	Provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request and with consultation of requestor. Notify the public about the availability of accessible formats and communication supports.	Post on internal and external LHSC website the availability of accessible formats upon request. Upon request, and in consultation with requester, provide agreed upon format.	January 1st, 2014	Completed. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 13 Emergency Procedure, plans and public safety	Provide emergency procedures, plans and public safety information in an accessible format as soon as practicable, upon request.	Upon request, emergency procedures will be made available in alternate formats, with consultation of requester.	January 1st, 2012	Completed. <b>Reviewed Dec 2019</b>
Reg. 191/11 s.14 WCAG 2.0 Level A	All new Internet websites and web content must conform with WCAG 2.0 Level A (excluding live captioning and pre-recorded audio descriptions)	Establish a procedure that all new websites created cannot be published unless meeting the WCAG 2.0 Level A requirements. Train web designers of the WCAG requirements.	January 1st, 2014 September 2018	Completed. Website redesign has taken place, meeting WCAG 2.0 Level A compliancy. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 14 WCAG 2.0 Level AA	All Internet websites and web content must conform with WCAG 2.0 Level AA (excluding live captioning and pre-recorded audio descriptions)	Revise internet website to conform to WCAG 2.0 Level AA requirements.	January 1st, 2020	Completed. <b>Reviewed Dec 2019</b>

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<b>Employment Standards</b>				
Reg . 191/11 s. 22 Recruitment	Notify employees and public about the availability of accommodation for applicants with disabilities in recruitment processes.	Statement on all job postings and career website internally and externally.	January 1st, 2014	Completed. Notification posted on all individual job postings and on LHSC website. <b>Reviewed Dec 2019</b>
Reg . 191/11 s. 23 Recruitment	Notify applicants once selected in assessment process that accommodations are available upon request in relation to materials or processes to be used. If requested, consult with applicant and provide arrangement that accounts for the applicant's accessibility needs.	When inviting all applicants for interview, notify that accommodations are available, if requested. Assess each request on an individual basis to accommodate.	January 1st, 2014	Completed. Trained hiring managers with in-class learning. <b>Reviewed Dec 2019</b>
Reg . 191/11 s. 24 Recruitment	When making offers of employment, notify successful applicant of its policies for accommodating employees with disabilities	Add notification to list of offer details (Offer of Employment Letters) People and Culture distribute to new staff.	January 1st, 2014	Completed on all Offer of Employment letters. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 25 Informing employees of supports (Accommodation)	Every employer shall inform its employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account accessibility needs. Provide this information as soon as practicable after they begin their employment. Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodation	Add reference to duty to accommodate policies in offer letter. Notify employees through e-cast of any changes/updates to the policy.	January 1st, 2014	Completed. Reference to Workplace Accommodation Policy listed on Offer of Employment letter and is available on LHSC website. Also, face to face meeting set up as soon as possible after hire date between new hire and Occupational Health, to discuss any needs required. <b>Reviewed Dec 2019</b>

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Reg. 191/11 s. 26 Accessible formats & Communication supports for employees	When requested, consult the needs and provide in accessible format: a) information needed in order to perform the employee's job b) information generally available to employees in the workplace	If requested, all duty outlines and job descriptions will be made available in appropriate formats (based on consultation)	January 1st, 2014	Completed. Posted on intranet website and communication sent to all staff to inform that accessible formats are available and to consult leader for individualized requests. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 27 Workplace emergency response information	Provide individualized workplace emergency response information to employees who have made aware to their employer the need for accommodation	Individualized work plans have been created by the Manager of Emergency Management to accommodate those employees who have made their leader aware of their need.	January 1st, 2012	Ongoing. As new individuals are identified as having disabilities, more workplace emergency response plans are created. Commitment to provide individualized plans is also available on LHSC intranet. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 28 Documented individual accommodation plan	Develop a written policy for developing documented individual accommodation plans (IAP) for employees with disabilities	Develop a policy and train all People and Culture Business Partners and Occupational Health on how to develop individualized work accommodation plans.	January 1st, 2014	Completed. Workplace Accommodation Policy revised July 21st, 2017. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 29 Return to Work Policy	Develop & document a return to work (RTW) policy for those who have been absent from work due to a disability and require disability-related accommodations in order to return to work. RTW shall include steps employer will take to facilitate RTW, and use the individualized accommodation plans	Occupational Health and People Services develop a policy, posting on the policy website. As employees are in process of RTW, Occ. Health, People Services & area leader work with employee to create IAP and assist the employee to return to work.	January 1st, 2014	Completed. Workplace accommodation policy revised July 21st, 2017. An e-learning module, Duty to Accommodate, has been created for leadership and has a 99% compliance rate. <b>Reviewed Dec 2019</b>
Reg. 191/11 s.30 Performance Management	Take into account the accessibility needs of employees with disabilities, as well as individual accommodation	When rolling out training for new e-performance system, ensure leaders are trained to take into account the accessibility needs of employees.	January 1st, 2014	Completed. Leadership attended in-class learning to ensure they are trained to consider

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	plans, with using its performance management process			accessibility needs during employee performance. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 31 Career Development and Advancement	Take into account the accessibility needs of employees with disabilities as well as any IAP's when providing career development and advancement to its employees with disabilities.	All internal job postings will state accessibility needs will be taken into account during selection process.	January 1st, 2014	Completed. Leadership attended in-class learning to ensure training to consider accessibility needs during employee progression and development. <b>Reviewed Dec 2019</b>
Reg. 191/11 s. 32 Redeployment	Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	People and Culture to create a procedure for redeployment, ensuring accessibility needs are taken into account before redeployment of an employee.	January 1st, 2014	Completed. <b>Reviewed Dec 2019</b>
<b>Transportation Standards</b>				
Reg. 191/11 s.76 Transportation	Provide accessible vehicles or equivalent services upon request.	Voyageur Transportation Services provides shuttle service on behalf of LHSC using accessible charter buses. Upon request, will meet specific needs.	July 1st, 2011	LHSC no longer offers staff shuttle service. Voyageur Transportation Services provides patient transfers and routinely provides accessible vehicles as well as accommodates requests. <b>Reviewed Dec 2019</b>
<b>Design of Public Spaces Standards</b>				
Reg. 191/11 s.80 Design of Public Spaces	For new construction and major changes to existing features of public spaces, adhere to design requirements for the following: recreational trails, outdoor public eating areas, outdoor play spaces, outdoor paths of travel, accessible parking, service-related elements like service counters, fixed queuing lines and waiting areas.	Facilities Management to adhere to regulations and new building code in all construction projects.	January 1st, 2016	Completed. Education of requirements for Facilities Management in DOPS completed 2015 and listed in Project Management & Design Administration Manual. Visual Workplace Inspections (WPI) of all public spaces are performed by Joint Health & Safety team and leadership, at a

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				minimum of annually. Any required maintenance is followed up with a work order to the Facilities Management Department. Temporary Disruptions are posted both online and with signage. <b>Reviewed Dec 2019</b>