

## **IAS MULTI YEAR ACCESSIBILITY PLAN**

Accessibility for Ontarians with Disabilities Act, 2005  
Integrated Accessibility Standards (IAS) – Multi Year Plan

### **Our Commitment**

Primary Health Care Services of Peterborough (PHCS) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

### **Accessibility Plan**

PHCS will develop, maintain and document an Accessibility Plan outlining the organization's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the organization's website. Upon request, PHCS will provide a copy of the Accessibility Plan in an accessible format.

PHCS's Multi Year Accessibility Plan is outlined below.

Part I – GENERAL REQUIREMENTS Section	Initiative	Description	Action	Status	Compliance Date
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.	Policy approved	Complete	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years.	Annual participation in webinars. Standing agenda item with Employee Counsel to identify barriers within the organization. Plan posted to website. Director of Operations will annually review Jan 1	Drafted Multi-Year Accessibility Plan	January 1, 2015
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Currently N/A, but will review annually.	Ongoing	January 1, 2014

<b>Part I – GENERAL REQUIREMENTS</b> Section	Initiative	Description	Action	Status	Compliance Date
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.	Mandatory online training module is completed annually.	Ongoing	January 1, 2015

<b>PART II – Information and Communications Standards</b> 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.	Feedback process in place and employees are aware to modify process accordingly to ensure accessibility for all persons.	Ongoing	January 1, 2015

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
12	Accessible Formats & Communication Supports	<p>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,</p> <p>a) in a timely manner that takes into account the person’s accessibility needs due to disability; and</p> <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>Identify the types of accessible formats and communication supports available provide to persons with disabilities upon request. Identify what ‘timely manner’ means within our organization. Communicate during training</p> <p>Communicate to staff and management this requirement ( through training).</p> <p>Develop a protocol for situations where a suitable agreement cannot be made</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2016</p> <p>January 1, 2016</p>

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
			<p>Develop a poster for waiting areas and reception areas and post notification on the website.</p> <p>Review printed materials and include notice where applicable</p>	Ongoing	January 1, 2016
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>Review policy with Health &amp; Safety representatives annually.</p>	Complete	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</p>	<p>Reviewed compliance requirements with external vendor.</p> <p>External vendor conducted an analysis of website and comparison with WCAG</p>	<p>Complete</p> <p>Ongoing</p>	<p>January 1, 2014</p> <p>New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p>

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
		Level AA, and shall do so in accordance with the schedule set out in this section.	guidelines and has identified compliance improvements.		January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> <li>• Success criteria 1.2.4 Captions (Live)</li> <li>• Success criteria 1.2.5 Audio Descriptions (Pre-recorded)</li> </ul>
PART III – Employment Standard 22	Recruitment-General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Include messaging on all job postings re being an Equal Opportunity Employer	Ongoing	January 1, 2016
23	Recruitment , Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available	Conduct a review of recruitment process and determine notification method to applicants – telephone, email, letter?	Ongoing	January 1, 2016

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
		<p>upon request in relation to the materials or processes to be used.</p> <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>Designate one contact person to handle queries regarding accessibility. Draft standard language to use during conversations.</p> <p>Identify aspects of process that could be considered barriers.</p> <p>Review interview guidelines and modify templates</p>		
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Draft statement to be included in all offer letters.	Ongoing	January 1, 2016





PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
26	Accessible Formats & Communication Supports for Employees	<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 supports for,</p> <p>(a) information that is needed in order to perform the employee’s job; and</p> <p>(b) information that is generally available to employees in the workplace.</p> <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>Work with the leadership team to review regular information and it’s availability in accessible formats.</p> <p>Include in standard process. Will include reviewing what the employee will required (i.e. policy, communication supports that are available such as texts-to-speech, large print, accessible PDFs, plain language versions, closed captioning)</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2016</p> <p>January 1, 2016</p>



PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
		<p>27. (4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee’s overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>Outlined in process.</p> <p>Outlined in process.</p>	<p>Complete</p> <p>Complete</p>	<p>January 1, 2012</p> <p>January 1, 2012</p>
28	Documented Individual Accommodation Plans.	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Develop policy and process.	Ongoing	January 1, 2016

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
		<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> </ol>	<p>Outline in policy. Develop templates to use as a guide to ensure each subsection is included.</p>	<p>Ongoing</p>	<p>January 1, 2016</p>

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
		<p>5. The steps taken to protect the privacy of the employee’s personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability.</p>			
29	Return to Work Process	29.(1) Every employer, other than an employer that is a small organization, (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	Develop policy and process.	Ongoing	January 1, 2016

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
		<p>to work; and (b) shall document the process</p> <p>29. (2) The return to work process shall, (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 (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>Outline in process. Develop template to use as a guide to ensure each subsection is included</p> <p>Language to be included in process.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2016</p> <p>January 1, 2016</p>
30	Performance Management	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	Review Current Performance Assessment Process	Ongoing	January 1, 2016

PART II – Information and Communications Standards Section	Initiative	Description	Action	Status	Compliance Date
		plans, when using its performance management process in respect of employees with disabilities.			
31	Career Development and Advancement	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.	Review internal recruitment and development process. Ensure individual accommodation plans are taken into account.	Ongoing	January 1, 2016
32	Redeployment	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.	Review internal recruitment and development process. Ensure individual accommodation plans are taken into account.	Ongoing	January 1, 2016