

AODA Multi-Year Accessibility Plan 2023 – 2027 | Huron Perth Public Health

Huron Perth Public Health (HPPH) 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 and are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (2005).

HPPH came into existence on January 1, 2020, upon the amalgamation of former Huron County Health Unit with former Perth District Health Unit. Both former health units achieved compliance prior to amalgamation, and existing policies and procedures and processes were brought into the new organization until HPPH reviewed and combined policies and processes. The Status column in the table below reflects work done since the merger.

HPPH has developed and made available upon request this Multi-Year Accessibility Plan, which outlines the actions in place to improve opportunities for people with disabilities. The multi-year plan provides details about the following categories:

- General Requirements
- Information and Communications
- Employment
- Design of Public Spaces Standard (Accessibility Standards for the Built Environment)

Category: General Requirements

	Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
1.	Establishment of Accessibility Policies	January 1, 2014	<p>Sec. 3(2) Shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities</p> <p>Sec. 3(3) Prepare one or more written documents describing its policies</p>	Consultant hired during amalgamation process to review and combine existing policies for review and adoption by Board of Health at initial amalgamation meeting.	MOH and Director of Corporate Services	Completed January 2, 2020
2.	Accessibility Plans	January 1, 2014	Sec. 4(1) Large organizations shall establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirement under this Regulation	Written multi-year accessibility plan established, reviewed and adopted by Senior Management team.	MOH and Director of Corporate Services	Updated by HPPH on June 25, 2020
3.	Training	January 1, 2014	Sec. 7 Every obligated organization shall ensure training is provided on the requirements of the accessibility standards referred to in the Regulation on the Human Rights Code as it pertains to persons with disabilities	All employees, board of health members and volunteers, all persons who participate in developing the organization’s policies; and all other persons who provide goods, services or facilities on behalf of the organization will be trained. Training will be appropriate to the duties of the individual being trained.	Director of Corporate Services	Completed prior to amalgamation; mandatory training is ongoing as part of the onboarding process for all new hires.

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
			<p>The Ontario Human Rights Commission’s videos, <i>Working Together: The Code and AODA</i> will be used to train those requiring training.</p> <p>See</p> <ul style="list-style-type: none"> • <i>Orientation Procedures</i> (under construction) 		
4. Accessibility Report	January 1, 2015	Sec. 86.1 Organizations shall file the accessibility report according to the following schedule: every three years in the case of large organizations	The accessibility reports were filed by former health units in accordance with the established deadlines of December 31, 2014, December 31, 2017, December 31, 2020 (extended to June 30, 2021), and December 31, 2023.	Director of Corporate Services	Completed September 8, 2021 & ongoing every 2 years or as required.

Category: Information & Communication

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
1. Feedback from Customers & Employees	January 1, 2014	Sec. 11 Receiving and providing feedback in an accessible format	<p>Clients may provide feedback to HPPH through email, by submitting a Customer Feedback form, calling 1-888-221-2133 or visiting one of our locations. Employees are given the opportunity to request accommodation at any time.</p>	Human Resources Manager and/or Communications Manager	Completed January 1, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger	
			See: <ul style="list-style-type: none"> • <i>Workplace Accommodation Policy and Procedure</i> 			
2.	Accessible Formats and Communications Supports	January 1, 2015	Sec. 12 Information about their goods and services or facilities	HPPH shall upon request provide or arrange for the provision of accessible formats for persons with disabilities. Fact sheets and brochures developed by external agencies are not controlled by HPPH; HPPH may link to such resources and/or provide accommodations for accessing them. Documents produced in-house (i.e. Fact Sheets) are all made available in accessible formats.	Communications Manager	Completed January 2, 2020
			Sec. 12 Communication Supports	Communication support will be provided in a timely manner, which consider the person’s needs. The cost to provide this service shall not be incurred by the client. The client will be consulted with to determine the suitability of a communication support. A list of local service providers	Communications Manager	Completed January 2, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
			will be contacted to facilitate this process. See: <ul style="list-style-type: none"> • <i>Accessible Client Service Standards</i> 		
3.	Unconvertible Information January 1, 2015	Sec. 12 Examples: blueprints or x-rays	HPPH uses documents produced by various Ontario Ministries, such as the Ontario Ministry of Health, Ontario Ministry of Long-term Care, and Ontario Ministry of Children, Community and Social Services. These documents are not under the control of HPPH and therefore cannot be provided in an accessible format.	Communications Manager	N/A
4.	Meeting requests in a timely manner January 1, 2015	Sec. 12 HTML, MS Word, accessible electronic formats	In some cases, HPPH will be able to provide the information or communication supports quickly. In other cases, more time will be required due to the complexity of the document/report and internal capacity of the organization.	Communications Manager	Completed January 2, 2020
5.	Posting requirements January 1, 2015	Sec. 12 Public must be notified about accessible formats and communication supports	The Health Unit's website includes an accessibility notice to communicate all AODA requirements.	Communications Manager	Completed January 1, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
6. Emergency Procedures / Plan or Public Safety Information	January 1, 2012	Sec. 13 If publicly available must also provide in an accessible format (i.e., evacuation procedures, floor plans, Health & Safety information)	Any emergency procedures/plan or public safety information HPPH makes publicly available will be made available in an accessible format upon request. See: <ul style="list-style-type: none"> • <i>Internal and Disaster Plan</i> 	Communications Manager	Completed January 2, 2020
7. Accessible Websites & Web Content	January 1, 2021	Sec. 14 All internet websites and web content to comply with WCAG 2.0 (World Wide Web Consortium web accessibility guidelines at Level AA)	HPPH's website is managed by a web development vendor and has been assured it is compliant with WCAG 2.0 Level AA standards. All PDF content added is checked for compliance prior to being uploaded.	Communications Manager	Completed January 1, 2020

Category: Employment

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
1. Recruitment, Assessment & Selection	January 1, 2016	Sec. 22 Notify employees and public about availability of accommodation(s) for applicants in the recruitment process	HPPH conducts its own recruitment, assessment and selection. This process is guided by collective agreements with the Ontario Nurses Association (ONA), Canadian Union of Public Employees (CUPE) and Ontario Public Service	Director of Corporate Services	Completed January 2, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
			<p>Employees Union (OPSEU). When posting internally or externally, information about the availability of accommodations is included.</p> <p>The following wording is included in all internal and external postings: <i>“Huron Perth Public Health (HPPH) is committed to providing people with a healthy, inclusive and accommodating workplace. HPPH is an equal opportunity employer and provides a dynamic and progressive work environment. We welcome and encourage applications from all persons, including those with disabilities. Upon request, we will provide reasonable accommodations for applicants with disabilities who take part in all aspects of recruitment and selection process in order to ensure all materials and processes are accessible to persons with disabilities.”</i></p>		
	January 1, 2016	Sec. 23 Notify applicants who have been invited to participate in a recruitment assessment or selection	HPPH notifies applicants when they are called for an interview about the availability	Director of Corporate Services	Completed June 26, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
		process that accommodations are available	of accommodations during the selection process.		
	January 1, 2016	Sec. 24 Offers of Employment – notify successful applicant of policies for accommodating employees with disabilities	HPPH notifies successful applicant(s) of their policies for accommodating employees with disabilities. This is done for all new hires who receive written offers of employment.	Director of Corporate Services	Completed June 26, 2020
	January 1, 2026	Sec. 25 Informing Employees of Supports – all employees must be informed of policies used to support employees with disabilities (existing employees, new hires, and when there is a change to the policy)	<p>HPPH informs all employees of their policies for supporting employees with disabilities. Notification may take several forms, such as meetings, training, Intranet (read & confirm requirements), or email.</p> <p>See:</p> <ul style="list-style-type: none"> • <i>Orientation Procedure</i> • <i>Workplace Accommodation Policy and Procedure</i> • <i>Employee Performance Review form</i> 	Director of Corporate Services	Completed June 26, 2020
2. Accessible formats and communication supports for employees	January 1, 2016	Sec. 26 Must provide in an accessible format information needed to perform the job and information which is generally available to employees in the workplace	HPPH will, upon request, consult with an employee with a disability to determine which accessible formats or communications supports they require to perform the duties of their job. An individual accommodation	Director of Corporate Services	Completed June 26, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger	
				plan will be completed, and the accessible formats and/or communication supports that will be provided to the employee noted in the plan.		
3.	Workplace emergency response information	January 1, 2016	<p>Sec. 27 Provide individualized workplace emergency response information; prepare for the specific needs employees with disabilities may have in emergency situations</p>	<p>HPPH creates individualized workplace emergency response plans for employees who have a disability and require accommodations(s)/support to evacuate their workplace in an emergency. With the employee’s consent, the person designated to provide assistance to the employee will be provided with the necessary information to assist the employee with the disability.</p> <p>See:</p> <ul style="list-style-type: none"> • <i>Workplace Accommodation Policy and Procedure</i> • <i>Internal Emergency and Disaster Plan</i> <p>NOTE: Employees are responsible to report accommodation needs to the employer in accordance with the above policies and procedures.</p>	Director of Corporate Services	Completed June 26, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
<p>4. Documented individual accommodation plans</p>	<p>January 1, 2014</p>	<p>Sec. 28 Develop and document individual accommodation plans for employees with disabilities; employee involvement, outside medical or expert evaluation; review frequently</p>	<p>HPPH creates individual accommodation plans for any employee for whom they have been made aware has a disability. There may be times when HPPH will initiate a dialogue to offer assistance and accommodation for employees who are clearly unwell or perceived to have a disability. The employee will be included in the development of the plan. HPPH may seek outside medical or expert evaluations in order to provide appropriate supports. The plan will be reviewed when there is a change in the employee’s disability or job.</p> <p>See:</p> <ul style="list-style-type: none"> • <i>Workplace Accommodation Policy and Procedure</i> 	<p>Director of Corporate Services</p>	<p>Completed June 26, 2020</p>
<p>5. Return to Work Process</p>	<p>January 1, 2014</p>	<p>Sec. 29 Develop and have in place a Return to Work process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work</p>	<p>HPPH has in place a Return to Work (RTW) 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. The RTW process will be documented.</p>	<p>Director of Corporate Services</p>	<p>Completed June 26, 2020</p>

	Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
				Current Workplace Safety and Insurance Board RTW processes will be modified for this process. If an individual's injury is covered by the RTW provisions of the Workplace Safety and Insurance Act, then the Act's RTW process would apply.		
6.	Performance Management	January 1, 2014	Sec. 30 Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, during the performance management process in respect to employees with disabilities	Under AODA, the term performance management means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success. HPPH will take into account the accessibility needs of employees with disabilities in the area of performance management. See: <ul style="list-style-type: none"> • <i>Employee Performance Review Policy and Procedure</i> 	Director of Corporate Services	Completed June 26, 2020
7.	Career Development and Advancement	January 1, 2014	Sec. 31 Includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be	HPPH will take into account what accommodations employees with disabilities may need to succeed elsewhere in the organization or to take on new responsibilities in their current	Director of Corporate Services	Completed June 26, 2020

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
		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	position. If the employee has an individual accommodation plan in place, the plan will be updated to reflect the changes in their new responsibilities.		
8.	Redeployment	Sec. 32 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	<p>In the event that HPPH will initiate a redeployment process, it will consider the accessibility needs of employees with disabilities when moving them to other positions within the organization. If the employee has an individual accommodation plan, the plan will be reviewed and updated to reflect the changes in their new responsibilities.</p> <p>HPPH strives to always accommodate an individual in their own job first. If due to the restrictions and limitations of the individual and the program needs this is not possible, we will search for a comparable position within the organization.</p>	Director of Corporate Services	Completed June 26, 2020

Category: Design of Public Spaces Standard (Accessibility Standards for the Built Environment)

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger
1.	Exterior Paths of Travel	January 1, 2017	<p>Sec. 80.21 Applies to newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience. O. Reg. 413/12, s. 6.</p>	<p>HPPH has not constructed or redeveloped an exterior path of travel since January 1, 2017.</p> <p>Should HPPH construct or redevelop an exterior path of travel in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.</p>	<p>Director of Corporate Services</p> <p>N/A</p>
2.	Accessible Parking	January 1, 2017	<p>Sec. 80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain; the off-street parking facilities meet the requirements set out in this Part. O. Reg. 413/12, s. 6.</p>	<p>HPPH has not constructed or redeveloped any accessible parking spaces since January 1, 2017.</p> <p>Should HPPH construct or redevelop accessible parking spaces in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.</p>	<p>Director of Corporate Services</p> <p>N/A</p>
3.	Obtaining Services	January 1, 2017	<p>Sec. 80.40 1. All newly constructed service counters and fixed queuing guides.</p> <p>2. All newly constructed or redeveloped waiting areas. O. Reg. 413/12, s. 6.</p>	<p>HPPH has not constructed any new service counters or fixed queuing guides.</p> <p>Should HPPH construct new services counters on their premises, proper guidance on</p>	<p>Director of Corporate Services</p> <p>N/A</p>

Component	Deadline	Requirement	Action(s)	Responsibility	Status since merger	
				this requirement will be consulted to ensure service counters are at least 680 mm or 27 inches in height.		