
**Accessibility –
Integrated Accessibility
Standards Regulations (IASR)**

Welcome!

All people have equal right of access to all goods and services provided by Grand River Hospital.

Service will be provided in a manner that promotes the dignity, autonomy, respect, and safety of persons with disabilities and is compliant with Integrated Accessibility Standards Regulations of the Accessibility for Ontarians with Disabilities Act (AODA) .

General Requirements

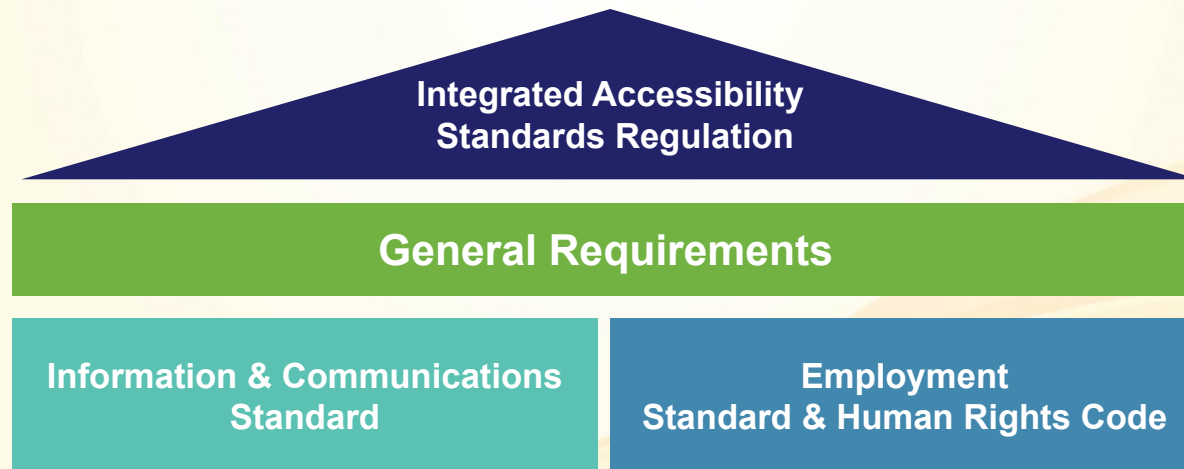


IASR Standards and General Requirements

The IASR includes standards which apply to GRH related to:

- Information and Communications
- Employment & the Human Rights Code

The IASR also includes general requirements that apply to all standards.



Accessibility Policies

An **Accessibility Policy** states what rules or principles an organization will put in place to support achieving its accessibility goals.

GRH has developed an accessibility policy which describes what we are doing, or intend to do, to meet the requirements of the regulation.

This policy serves as rules that guide our organization's everyday practices.

GRH's previous Accessible Customer Service Policy has been revised to include the IASR and is now titled **Accessibility Policy**. The Accessibility Policy is available via Lotus Link. Please take some time to review the updated policy.

Accessibility Plans

An **Accessibility Plan** describes the actions an organization will take to prevent and remove barriers and when it will do so.

An accessibility plan is an organization's road map for increasing accessibility – that is, the actions that support an organization's commitment to accessibility and its accessibility policies.

GRH has developed a multi-year accessibility plan which outlines the steps that our organization will take to prevent and remove barriers to accessibility and how the requirements of the regulation will be met.

The most current plan is available via the GRH website under Accessibility.

Barriers to Accessibility

Barriers can prevent a person with a disability from fully participating in society.

Some examples of such barriers include:

Information/ communication:	Print that is too small to read
Attitudinal:	Assuming that a person who has a speech impairment cannot understand you
Technological:	A website that does not support screen reading software
Policy or practice:	A hiring process that does not offer accommodations in interviews

Self-Serve Kiosks: Example of a Barrier to Accessibility

GRH has self-service kiosks that use touch-screen technology. Examples include: pay and display parking kiosks, ATMs, change machines, Interac payment terminals and the ISSAC kiosks in the Cancer Centre.

People with disabilities should be able to use a self-service kiosk as independently and securely as possible.

For example: Touch-screen technology is difficult or impossible for people with vision loss to use and use of tactile keyboard or audio instruction should be considered.



Procurement

It's also important to incorporate accessibility criteria into procurement and buying practices.

Doing so can make a significant impact on preventing new accessibility barriers and addressing existing ones.

- For example, GRH might set accessibility criteria when procuring new computer software or self serve kiosks so that it can accommodate the needs of people with vision loss.

GRH has incorporated accessibility criteria into our standard contract templates.

Information and Communication Standards



The Information and Communication Standards of the Integrated Accessibility Standards Regulation

The Information and Communication Standard of the Integrated Accessibility Standards Regulation establishes processes that businesses and organizations in Ontario must follow to create, provide, and receive information and communications in ways that are accessible to people with disabilities.

Accessible Formats and Communication Supports

When requested, you must provide information and communications in an accessible manner to people with disabilities.

Alternatives to standard print are often referred to as **accessible formats**, and ways to help communication between people are referred to as **communication supports**.

When a request is received, you must consult with the person to determine their accessibility needs.

The organization has the flexibility to determine the most appropriate accessible format or communication support depending on the accessibility needs of the person and the organization's capability to deliver.

Examples of Accessible Formats and Communication Supports

Accessible formats and communication supports must be provided in a timely manner and at no additional cost.

Examples of alternate formats and communication supports:

- Reading written information to a person directly;
- Large print;
- Text transcripts of audio or visual information;
- Handwritten notes instead of spoken word;
- Information written in plain language; and
- An electronic document formatted to be accessible for use with a screen reader.

Exceptions to the Requirement

This requirement is about providing accessible information and communications about goods, services, or facilities offered to customers, clients, and others.

The requirement does not apply to the following:

- Products and product labels.
 - Example: A pharmacy is not required to relabel products but would have to take into account a person's disability when communicating with them about their products, such as verbally informing them of selection, dosage, side effects, etc.
- Information that you do not control directly or indirectly through a contract, unless your organization is involved in education or training as defined in the regulation.
- Information or communications that cannot be converted.

When It's Not Possible...

There might be instances when you are unable to convert the requested information or communication – for example, if:

- The technology to convert the information is not readily available; or
- The information may be lost in the conversion process and cannot be conveyed in a meaningful way (i.e., visual information in an x-ray or architectural blueprint).

When it's not possible to convert the requested material, you need to provide the individual making the request with the following:

- An explanation as to why the information or communications are unconvertible; and
- A summary of the information or communications.

Feedback Processes

Under the Accessibility Standard for Customer Service, GRH established a customer service feedback process for receiving and responding to feedback about how we provide goods or services to people with disabilities.

The Information and Communications Standard requires that this feedback process be accessible. This may include:

- Arranging for accessible formats and communication supports on request.
- Notifying the public about the availability of accessible formats and communication supports.

At GRH feedback can be provided by phone, letter, email or in person.

Accessible Websites and Web Content

GRH's website is often a primary way we share information – that's why it's important that it and its content be accessible.

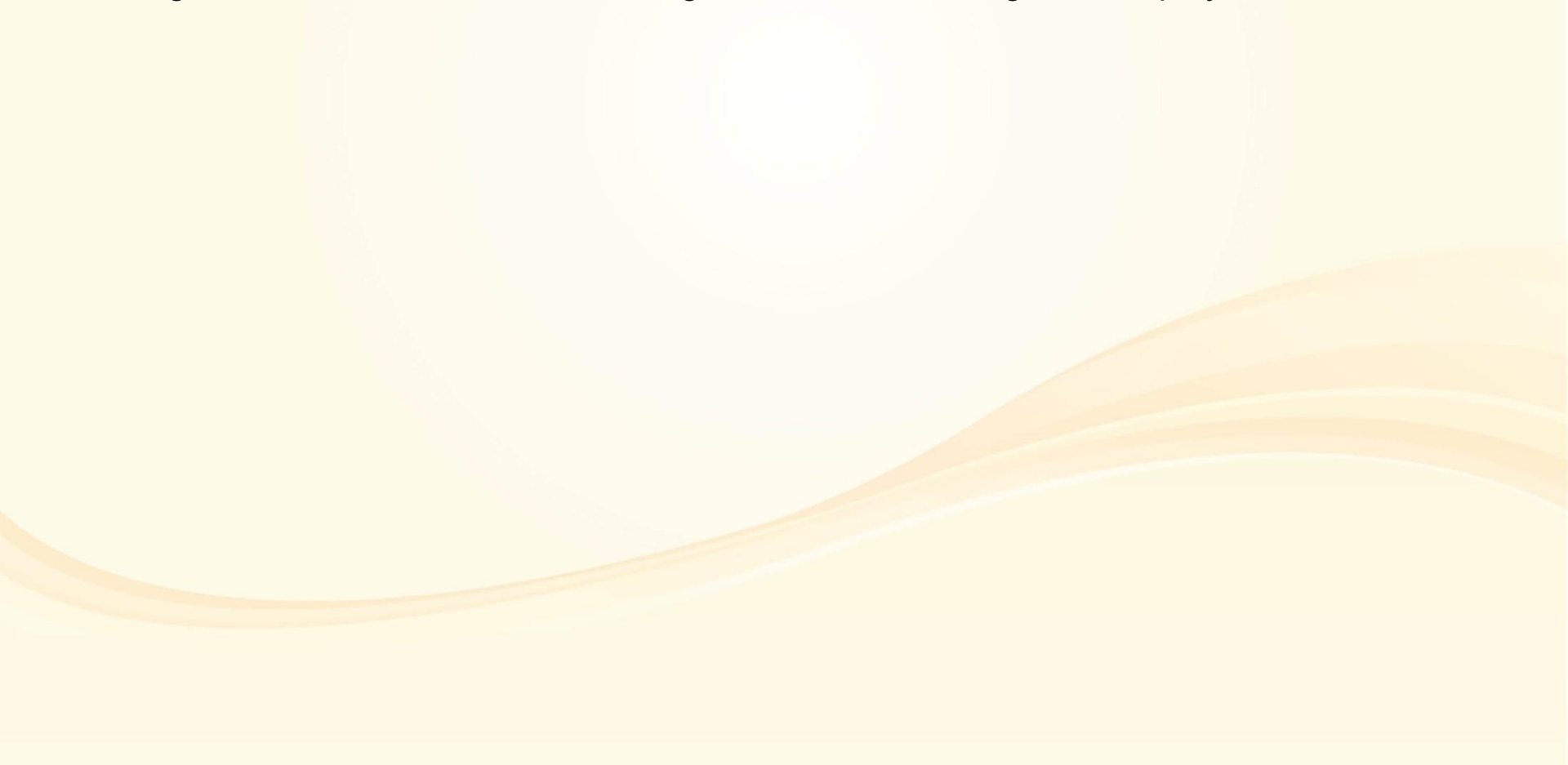
GRH, in collaboration with our contracted website provider, will ensure that our website content complies with the standard.

Employment Standards



The Employment Standards of the Integrated Accessibility Standards Regulation

The Employment Standard of the Integrated Accessibility Standards Regulation deals with accessibility in the employment cycle. It addresses the processes and procedures our organization must follow in recruiting and accommodating their employees.

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Informing Employees of Supports

The Employment Standard requires employers to inform all employees, both new and existing, of their accessible employment practices.

This includes, but is not limited to, policies on providing job accommodations that take into account an employee's accessibility needs due to disability.

This will make all employees aware of how the organization will support them if they have a disability – or if they acquire a disability later in their career.

Accessible Recruitment Process

GRH is committed to ensure our recruitment processes are accessible in the following ways:

When advertising job positions, GRH must state that accommodations for job applicants with disabilities are available on request.

When inviting job applicants to participate in the selection process, GRH must state that accessibility accommodations are available on request to support their participation.

When offering a job to a successful applicant, the applicant must be informed of our organization's policies on accommodating employees with disabilities.

The Human Resources department will support Managers in these efforts.

Accessible Formats and Communication Supports

Once hired, employees may request accessible formats and communication supports.

This requirement is similar to those in the Information and Communications Standard.

GRH must consult with employees to determine their accessibility needs and how best to accommodate them.

Examples of Accessible Formats and Communication Supports

Accessible formats and communication supports can be requested for:

- Information required for the employee to perform their job; and
- Information generally available to all employees.

Examples of accessible formats or communication supports an employee may require include:

- Access to the use of software such as a screen reader;
- Documents in an electronic format; and
- Text transcripts of visual or audio information.

Documented Individual Accommodation Plans

An individual accommodation plan is a formal way to record and review the workplace-related accommodations that will be provided to an employee with a disability.

Occupational Health, Safety and Wellness will work with an employee with a disability to find the appropriate accommodation to meet the individual's accommodation needs.

GRH has a written process to document individual accommodation plans for employees with disabilities.

This helps our organization have a clear and consistent approach for accommodating employees with disabilities.



Workplace Emergency Response Information

Individualized emergency response information can help both employees with disabilities and organizations prepare for various emergencies such as fire, power outages or severe weather.

For example, an employee who cannot hear a fire alarm will need to know how and when to safely exit the building in the event of a fire.

GRH will provide individualized workplace emergency response information to employees. With the employee's consent, this information is shared with anyone designated to help them in an emergency.

Individualized emergency response information must be reviewed when:

- The employee moves to a different location in the organization;
- The employee's overall accommodation needs or plan are reviewed; or
- GRH's emergency response policies are reviewed.

Performance Management, Career Development and Redeployment

The standard requires that these processes take into account the accessibility needs of employees with disabilities and their individual accommodation plans.

Here are some examples of how these requirements could apply:

- Providing a performance plan document in large print to an employee with low vision;
- Reviewing an employee's accommodation plan to understand the individual's accommodation needs and determine if the plan needs adjusting to improve his or her performance on the job;
- Adjusting accommodation supports or updating an accommodation plan, with the employee's participation, to meet the employee's new role or responsibilities in the event the employee is promoted or redeployed.

Return to Work Process

An employee with a disability may sometimes need to take time off work for a treatment, recovery, or other reasons.

In addition, a disability such as an injury or illness can happen at any time and to any of us.

GRH has a process that supports employees who have been absent due to a disability and who require disability-related accommodations when they return to work.

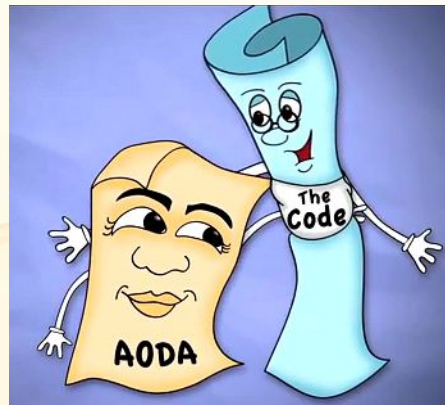
The return to work process must be documented.

The Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act

The Human Rights Code (The Code) and Accessibility for Ontarians with Disabilities Act (AODA)

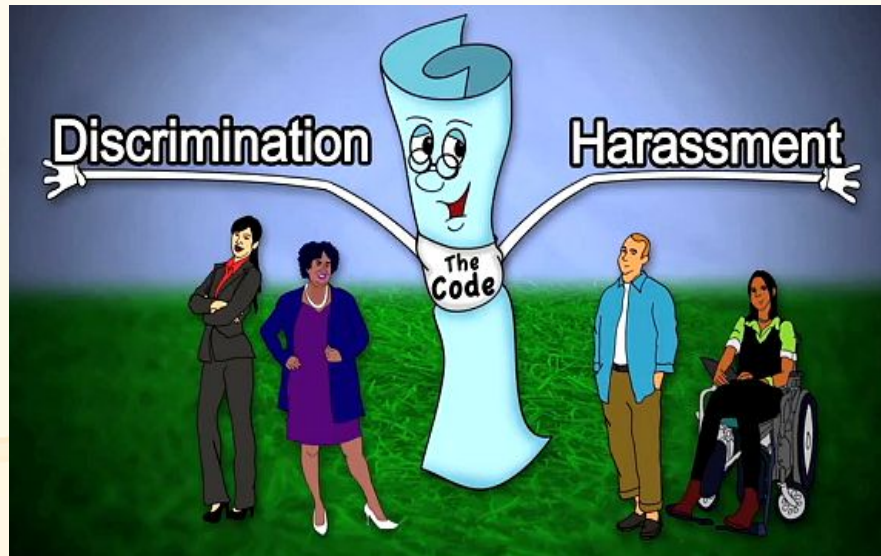
The Code and AODA work together in various ways to promote equality and accessibility.

- The Code and the AODA are both provincial laws, and both use the same definition of disability.
- The Code has primacy. This means that Ontario laws (with a few exceptions), including the AODA have to follow the Code.
- Its goal is to provide for equal rights so as to create a climate of respect where everyone feels part of the community and can contribute fully.
- The Code says people with disabilities must be free from discrimination where they work, live, and receive services, and their needs must be accommodated.



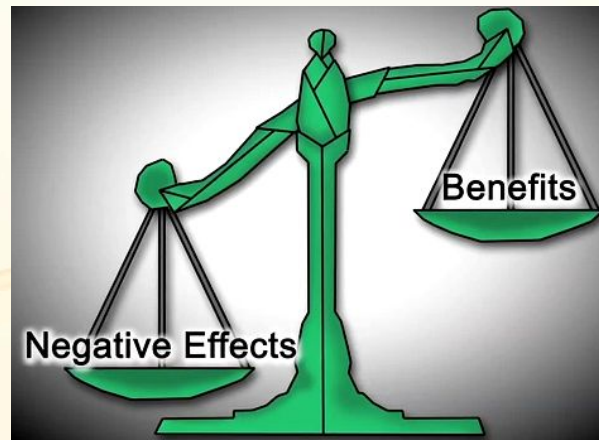
Purpose of the Code

- The Code protects people from discrimination and harassment because of past, present, or perceived disabilities.
- When discrimination happens, the goal is to fix the situation to provide equal opportunity for the person with a disability.
- The Code promotes educating and working with organizations to make changes that prevent discrimination and harassment.



Understanding the Duty to Accommodate

- Accommodating the individual needs of people with disabilities is a legal duty under the Code.
- This allows people to benefit equally and take part fully in the workplace.
- The most appropriate accommodation is the one that best meets the individual needs of the person with a disability.
- Employers are only exempt if it would cause undue hardship – a very high test. Many accommodations can be made easily and inexpensively. But if it's not possible to put the best solution in place, or if doing so results in undue hardship, employers still have the duty to take the next-best steps.



Undue Hardship

Undue hardship is the legal limit of the duty to accommodate. It refers to situations where severe negative effects outweigh the benefit of providing accommodation.

Three factors are used to determine undue hardship:

1. **Costs.** Renovating an older building to make it accessible may be too costly for a small business. If the business must reduce staff or hours to provide the accommodation, then it may be able to claim undue hardship.
2. **Are there external funding sources**, such as grants or tax breaks, to reduce the accommodation costs?
3. **Health and safety considerations.** There may be undue hardship if the accommodation violates occupational health and safety regulations. For example: If someone is on medication for their disability that makes them drowsy it may be a health and safety risk to allow them to carry out their job functions due to the potential danger to patients, other employees, or even to the employee themselves.

Employee Responsibilities in the Accommodation Process

- If you need an accommodation tell your employer about any needs related to your disability and your job duties.
- Provide supporting information about your disability-related needs, including medical or other expert opinions where required.
- Get involved in seeking accommodation solutions to the best of your ability.

Employer Responsibilities in the Accommodation Process

- Accept requests for accommodation in good faith.
- Act promptly, even if it means creating a temporary solution before a long-term one can be put in place.
- Ask only for information needed to provide the accommodation. For example, employers may need to know that someone with vision loss is unable to read printed material, but not how or why she lost her vision.
- Actively seek appropriate accommodation solutions and ask for expert help if needed.
- Cooperate with other parties where necessary.
- Respect the dignity and privacy of the person asking for accommodation, and make sure the accommodation process doesn't lead to reprisals against that person.
- Cover the costs of accommodations, such as any needed medical or other expert opinions or documents, to the point of undue hardship.
- If accommodation in the original job isn't possible or would cause undue hardship, employers should consider other available jobs or re-training opportunities that could accommodate the employee in another job.

Examples of Accommodation

Examples of accommodation include:

- Providing printed material in alternative formats such as electronic files, large print or Braille.
- Providing sign language interpreters or real-time captioning for people who are deaf or hard of hearing
- Offering flexible work hours or break times
- Modifying job duties, retraining, or offering alternative work
- Installing automatic door openers and accessible washrooms

References and Acknowledgements:

The Accessibility for Ontarians with Disabilities Act can be accessed from the Ontario e-laws website at the following link: http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm

The Integrated Accessibility Standards Regulations can be access from the Ontario e-laws website at the following link: http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_110191_e.htm

The Ontario Human Rights Code can be accessed from the Ontario Human Rights Commission website at the following link:

<http://www.ohrc.on.ca/en/ontario-human-rights-code>

A significant portion of the material presented in this course was obtained from complimentary training modules developed by Curriculum Services Canada, in partnership with the Accessibility Directorate of Ontario under the Government of Ontario's EnAbling Change Partnership Program. These modules are available in multiple formats and can be accessed at the following link: www.accessforward.ca

A significant portion of the material presented in the section of this course related to the Ontario Human Rights Code and the AODA was obtained from a complimentary training module developed by The Ontario Human Rights Commission, in partnership with the Accessibility Directorate. The training video can be accessed at the following link:

<http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act>