

Policy Name:	INTEGRATED ACCESSIBILITY STANDARDS POLICY	
Created:	January 4, 2016	

INTEGRATED ACCESSIBILITY STANDARDS POLICY

PURPOSE

The purpose of the Integrated Accessibility Standards Policy is to develop, implement and maintain policies which govern how MHS will achieve accessibility measures as required through the Accessibility for Ontarians with Disabilities Act (AODA). These standards were developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications and employment.

OVERVIEW

The Integrated Accessibility Standards policy was established by MHS to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the AODA, 2005.

MHS is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

OBJECTIVE

The objective of this policy is to ensure MHS treats 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 AODA.

This policy will be implemented in accordance with the time frames established by the Regulation.

Accessibility Plan

MHS develops, maintains and documents the following Accessibility Plan, which outlines the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan is reviewed and updated at least once annually and posted on the company's website.

ACCESSIBILITY STANDARDS FOR CUSTOMER CARE

Training

MHS ensures that training is provided on the requirements of the accessibility standards referred to in the Regulation and continues to provide training on the *Human Rights Code* as it pertains to persons with disabilities, as follows:

- all MHS employees and volunteers;
- all persons who participate in developing MHS's policies; and,
- all other persons who are contracted to provide goods, services or facilities on behalf of the company

The training is appropriate to the duties of the employees, volunteers and other persons.

Employees are trained when changes are made to the accessibility policy. New employees will be trained during their first week of employment.

MHS will keep a record of the training it provides.

Feedback

MHS continues to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, MHS will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

MHS will consult with the person making the request in determining the suitability of an accessible format or communication support.

MHS will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

MHS ensures that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA, except where this is impractical.



ACCESSIBILITY STANDARDS FOR EMPLOYMENT

Recruitment

MHS will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

MHS will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, MHS will 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.

Notice to Successful Applicants

When making offers of employment, MHS will notify the successful applicant of its policies for accommodating employees with disabilities.

Policy Review

MHS continues to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. Policies are reviewed annually and introduced to new employees when they are onboarded.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, MHS will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, MHS will consult with the employee making the request.

Workplace Emergency Response Information

MHS provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if MHS is aware of the need for accommodation due to the employee's disability. MHS will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, MHS will, with the consent of the employee, provide the workplace emergency response information to the person designated by MHS to provide assistance to the employee.

MHS will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

Individual Accommodation Plans

MHS maintains a process for the development of individual accommodation plans for employees with disabilities and documents the corresponding individual accommodation plan implemented.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

Return to Work Process

MHS maintains a return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process outlines the steps MHS will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (ie., the *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment

MHS takes into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

FOR MORE INFORMATION

For questions related to this policy, please contact the Privacy Officer via email at privacyofficer@mhs.com.

DOCUMENT INFORMATION

Document Revision History

Ver. No.	Ver. Date	Prepared By	Approved By	Affected Section & Summary of Change
1.0	Jan 4, 2016			Initial Draft
1.1	Nov 10, 2020			Updated Policy sections
1.2	January 12, 2021			Annual Review

Comentado [CR1]: In lieu of a formalized documented accommodation step process plan/flow that is implemented as protocol

Comentado [HW2R1]: not sure what you are looking for here Claudia - do you need confirmation this is OK or should we be developing something else

Comentado [CR3R1]: We need to develop a formalized process for accommodations so i.e. step 1, step 2, etc. so including this language for now - HR will be creating this process in 2021 so we can update this policy. Some compliance standards require we have this step process formalized and documented.

Comentado [CR4]: In lieu of a formalized documented return to work step process plan/flow that is implemented as protocol

Comentado [HW5R4]: See above