

## **Integrated Accessibility Standards – OP-POL-22**

### **Operational Policy**

#### **1.0 Policy Statement**

The Health Unit is committed to providing and working toward a barrier-free environment for all clients, employees, and visitors who access our programs, services, and facilities.

#### **2.0 Purpose**

The purpose of this policy is to:

- Identify, prevent, and remove barriers faced by people with disabilities and accessing Health Unit services and facilities.
- Make employment practices accessible to meet the needs of employees and job applicants with disabilities
- Provide an environment that maintains dignity, independence, and equitable participation of individuals
- Meet the legislative requirements outlined in the *Accessibility for Ontarians with Disabilities Act (AODA) and the Integrated Accessibility Standards Regulation, 191/11 (IASR)*

#### **3.0 Applicability**

This policy applies to all Health Unit personnel including staff, students, volunteers, and Board of Health members.

#### **4.0 Scope**

This policy serves to guide the planning, and the delivery of services to adhere to the legislative requirements outlined in the *Accessibility for Ontarians with Disabilities Act* in these key areas:

- General Requirements (Policy, Plans, and Training)
- Information and Communication
- Customer Service

- Employment
- Built Environment and Public Spaces

## 5.0 Responsibility

### **All Health Unit personnel are responsible for:**

- Being aware of and working in compliance with the *IASR* as it relates to their role/portfolio
- Completing any training related to this policy

### **The AODA committee is responsible for:**

- Reviewing the *IASR* and ensuring the requirements to maintain compliance are met.
- Developing, implementing, and updating the Health Unit Accessibility Plan that outlines our commitment to meet the needs of people with disabilities.
- Developing and revising procedures and policies related to AODA
- Reviewing feedback from clients/visitors/staff on accessibility issues and suggesting strategies for improvement.
- Educating, communicating and promoting AODA information internally and externally
- Identifying areas for professional development to meet identified needs.
- Completing and submitting an annual report to the Executive Team.

### **Executive Team and Managers are responsible for:**

- Providing leadership in removing barriers for people with disabilities in Health Unit services, products, facilities, and employment.

### **The Medical Officer of Health is responsible for:**

- Providing leadership in removing barriers for people with disabilities in our services, products and facilities.

## 6.0 Definitions

### **Accessibility for Ontarians with Disabilities Act, 2005 (AODA):**

In 2005, the Ontario Government passed the Accessibility for Ontarians with Disabilities Act (AODA) to make Ontario accessible by 2025. This act (AODA) applies to every person or organization in the public and private sectors in the Province of Ontario, including the Legislative Assembly of Ontario. This act allows the province to establish standards related to accessibility that applies to both the public and private sector. These standards are rules that businesses and organizations in Ontario need to follow to identify, remove, and prevent barriers, so that people with disabilities have more opportunities to participate in everyday life.

### **Integrated Accessibility Standards Regulation, 191/11 (IASR):**

The IASR includes five standards in the areas of:

- **Information and communication:** The standard outlines requirements for organizations to create, provide, and receive information and communications that are accessible for people with disabilities. For example, organizations must provide information and communications in an accessible format to people with disabilities upon request and in a timely manner.
- **Employment:** The standard requires that employers make their workplace and employment practices accessible to potential or current employees with disabilities. For example, employers that make an offer of employment to a successful job applicant must inform the applicant of their organization's policies for accommodating employees with disabilities.
- **Design of public spaces:** The standard outlines the need for newly constructed or redeveloped public spaces to be accessible for people with disabilities. For example, organizations must provide accessible parking for people with disabilities when building new or redeveloping existing parking spaces.
- **Customer service:** The standard outlines requirements for removing barriers for people with disabilities so they can access goods, services, and/or facilities. For example, a person who requires the use of a service animal must be permitted to enter the premises. They also must be allowed to keep the service animal with them, unless excluded by law.

- **Transportation (does not apply to the Health Unit):** The transportation standard sets out the requirements for transportation service providers. Particularly, features and equipment on vehicles, routes, and services offered must be accessible to people with disabilities. For example, no conventional or specialized transportation service is permitted to charge a fare to a support person who is accompanying a person with a disability.

Furthermore, the IASR includes general information and requirements that apply to all the standards.

The IASR requirements are not a replacement for the *Human Rights Code* requirements, and they do not limit obligations under any other legislation. Therefore, if two laws conflict with one another, the law that provides the higher level of accessibility is the law that must be followed.

See [Integrated Accessibility Standards Regulation Requirements](#).

**Barriers:** defined as “anything that prevents a person with a disability from fully participating in all aspects of society because of their disability”.

**Disability:** defined, per Section 2 of the *Accessibility for Ontarians with Disabilities Act*, 2005, S.O. 2005, c. 11 and the *Ontario Human Rights Code*, R. S. O. 1990, c. H. 19 as:

- “(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*, 1997.”

**Accessibility:** A concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic,

political and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.

**Accessible:** Refers to products, devices, information, services, facilities or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both “direct access” (i.e. unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.

**Accessible Formats:** may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.  
(*Accessibility for Ontarians with Disabilities Act, 2005, Ontario Regulation 191/11*)

**Service Animal:** defined as “an animal that is trained to carry out tasks for persons with disabilities”. For example, these trained animals may be used to assist a person who is blind, has a vision impairment or low vision; a person who is deaf, deafened, or hard of hearing; a person who has a mobility disability or difficulties with strength or dexterity; a person who has autism or a developmental disability; a person who has a mental health disability.

**Support Person:** means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities. *O. Reg. 165/16, s.16.*

## 7.0 Consequences of Non-Compliance

A violation to this policy is reported using a Quality Issue Report (QIR). Non-compliance with this policy is addressed and may result in disciplinary action.

Depending on the severity of the violation, failure to comply with the AODA can result in fines up to \$100,000 per day for corporations.

## 8.0 Related Documents

### Internal References

- a) Quality Issue Reporting – WI-HU-065
- b) Retention and Management of Records – 2-1

- c) [Integrated Accessibility Standards Regulation Requirements](#)
- d) [Integrated Accessibility Standards – Assistive Devices](#)
- e) [Integrated Accessibility Standards – Communicating with People with Disabilities](#)
- f) [Integrated Accessibility Standards – Mandatory Training](#)
- g) [Integrated Accessibility Standards – Service Animals and Support Persons](#)

#### **External References**

- a) [Human Rights Code](#)
- b) [Integrated Accessibility Standards, Reg. 191/11](#)
- c) [Accessibility for Ontarians with Disabilities Act, 2005](#)

#### **Associated Operational Procedures**

- a) Integrated Accessibility Standards – Client Feedback Process – WI-AODA-006
- b) Integrated Accessibility Standards – Notice of Temporary Disruptions – WI-AODA-004

### **9.0 Summary of Revisions**

2025-01-14 - New Operational Policy

### **10.0 Policy Development Details**

Approved by: **Executive Team**

Date Approved: **2025/01/14**

Date Effective: **2025/01/23**

Date Due for Review: **2030/01/23**

**For more information, contact the policy owner:** Executive Director, Corporate Services