# LAMP Multi-year Accessibility Plan

## Introduction

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was enacted to develop, implement, and enforce Accessibility Standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises throughout Ontario by the year 2025. Accessibility Standards include the Accessible Customer Service Standard (O. Reg. 429/07), the Integrated Accessibility Standard Regulation (IASR) – including the areas of Information & Communication, Transportation Employment and the Design of Public Spaces (O. Reg. 191/11).

The requirements in the standards set out in the IASR are not a replacement or a substitution for the requirements established under the Ontario Human Rights Code. Under the IASR, LAMP Community Health Centre is required to establish, implement, maintain and document a multi-year accessibility plan. This plan outlines LAMP's strategy to identify, prevent and remove accessibility barriers and meet its requirements under the IASR.

## Our Commitment

LAMP 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 people with disabilities in a timely manner, and will do so by identifying, preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

## The Journey to Inclusion for Employees with Disabilities



## Definitions

For the purposes of this plan, the following definitions apply:

A **"barrier"** is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an informational or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice (organizational barrier).

**Architectural** and **physical** barriers are features of buildings or spaces that cause problems for people with disabilities. Examples are:
- hallways and doorways that are too narrow for a person using a wheelchair, electric scooter or walker
- counters that are too high for a person of short stature
- poor lighting for people with low vision
- doorknobs that are difficult for people with arthritis to grasp
- parking spaces that are too narrow for a driver who uses a wheelchair
- telephones that are not equipped with telecommunications devices for people who are Deaf, deafened or hard of hearing

**Information** or **communications** barriers happen when a person can't easily understand information. Examples are:
- print is too small to read
- websites that can't be accessed by people who do are not able to use a mouse
- signs that are not clear or easily understood
- a person who talks loudly when addressing a person with a hearing impairment

**Attitudinal** barriers are those that discriminate against persons with disabilities. Examples are:
- thinking that persons with disabilities are inferior
- assuming that a person who has a speech impairment can't understand you
- a receptionist who ignores a customer in a wheelchair

**Technological** barriers occur when a technology can't be modified to support various assistive devices. An example is:
- a website that doesn't support screen-reading software

**Organizational** barriers are an organization's policies, practices or procedures that discriminate against persons with disabilities. Examples are:
- a hiring process that is not open to persons with disabilities
- a practice of announcing important messages over an intercom that persons with hearing impairments cannot hear clearly

## Disability is:

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.

## **Multi-Year Accessibility Chart**

| Action | Responsibility | Compliance | Status |
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| A Multi-year Accessibility Plan is being developed.<br><br>Post multi-year plan on a website and provide in an accessible format, upon request.<br><br>Review the plan at least every five years. | Manager, Human Resources | January 1<sup>st</sup>, 2014 | Completed |
| Develop and implement Integrated Accessibility Standards policy.<br><br>Make the Policy available and provide accessible format, upon request.<br><br>Review and update as required.<br><br>Update the New Employee Orientation on-boarding package. | Manager, Human Resources | January 1<sup>st</sup>, 2014 | December 31, 2015 |
| Ensure that training is developed on the IASR and the Human Rights Code as it pertains to persons with disabilities and is provided by January 1<sup>st</sup>, 2015 to employees, volunteers, persons who participate in developing policies and other who provide services or facilities on behalf of LAMP.<br><br>Keep a record of the dates and the individuals who received the training. | Manager, Human Resources | March 1<sup>st</sup>, 2015 | Training will be done in October 2014.<br><br>Then, new employees will be trained as hired. |
| Ensure that processes for receiving and responding to feedback are accessible and meet the requirements of the IASR.<br><br>Procedures will be established for handling temporary disruptions in service when an accessible part of our public spaces stops working, such as putting up a sign explaining the disruption and outlining an alternative. | Management Team<br><br>Manager, Human Resources | January 1st, 2015<br><br>January 1<sup>st</sup>, 2014 | On-going<br><br>January 31<sup>st</sup>, 2016 |
| Upon request, to the extent practicable, provide the provision of accessible formats and communication supports for persons with disabilities. | Managers & Supervisors | January 1<sup>st</sup>, 2015 | On-going |

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| Consult with person making the request to determine suitability of accessible format or communication support. | | | |
| Emergency procedures, plans, or public safety information, that is publicly available, shall be provided in an accessible format or with appropriate communication supports, upon request as soon as practicable. | Manager, Human Resources and Health & Safety Committee | January 1$^{st}$, 2012 | December 31$^{st}$, 2015 – then on-going. |
| Websites and web content published after 2012 to conform to WCAG 2.0 Level A initially and increasing to WCAG 2.0 Level AA by January 1, 2021 to extent practicable.<br><br>Provide training to employees/Managers on procedures on website accessibility. | Manager, Human Resources and IT Manager.<br><br>Web Developer | January 1$^{st}$, 2016 | On-going |
| Review and update existing recruitment, policies, procedures and processes.<br><br>Provide training to all Hiring Managers & Supervisors on standards.<br><br>Specify that accommodation is available for applicants with disabilities on the website and on job postings<br><br>If selected applicant requests accommodation, consult with the applicant and arrange for provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability. | Manager, Human Resources | January 1$^{st}$, 2016 | December 31, 2015<br><br>September 31, 2015<br><br>On-going |
| Informing current employees and new hires as soon as practicable after they begin employment of policies supporting employees with disabilities.<br><br>Keep employees up to date on changes to policies / procedures relating to accommodation and return to work policy. | Manager, Human Resources | January 1$^{st}$, 2016 | On-going |
| When requested by an employee with a disability, employers shall consult with the employee and provide or arrange for the provision of suitable accessible formats and communication supports needed to perform the employee's job. | Manager, Human Resources | January 1$^{st}$, 2016 | On-going |
| Individualized workplace emergency response information procedures have been developed for employees with disabilities. | Manager, Human Resources and Health & Safety Committee. | January 1$^{st}$, 2016 | On-going |

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| Include in the process and plans all the required elements in accordance with the provisions of the IASR. | | | |
| Review and update existing policies, practices to ensure compliance with IASR.<br><br>Take the accessibility needs of employees with disabilities and as applicable, individual accommodation plans, into account as part of performance management processes, when assessing performance, providing career development & advancement opportunities and considering redeployment. | Manager, Human Resources and Management Team | March 31st, 2015 | On-going |
| Use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so. | Manager, Human Resources | January 1st, 2014 | December 31st, 2015 |