



Canadian Mental
Health Association
Halton Region Branch
Mental health for all

Association canadienne
pour la santé mentale
Filiiale de la région de Halton
La santé mentale pour tous

**Canadian Mental Health Association
Halton Region Branch**

AODA – Integrated Standards Policy and Multi-Year Accessibility Plan

**Prepared December 2013
Revised December 2014**

Introduction

The Canadian Mental Health Association – Halton Region Branch (CMHA-HRB) supports the rights of all people to enjoy equal opportunity and to participate fully in all activities of the Agency. The right of persons with disabilities to equal treatment, without discrimination in accordance with the Human Rights Code, is addressed in a number of Ontario statutes and regulations. CMHA-HRB is committed to removing existing barriers and ensuring that no new ones are created.

Ontarians with Disabilities Act, 2001 (ODA)

In December 2001, the Ontarians with Disabilities Act, 2001 (ODA) was passed into law. Its purpose was to improve opportunities for people with disabilities and to provide for their involvement in the identification, removal and prevention of barriers to their full participation in the life of the province.

One of the requirements under the ODA is that Ontario government ministries, municipalities, hospitals, school boards, colleges, universities, and public transportation organizations develop annual accessibility plans to make policies, practices, programs, services and buildings more accessible to people with disabilities. The plans must be made available to the public.

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

In June 2005, the Ontario government took a strong stand on accessibility when it passed the Accessibility for Ontarians with Disabilities Act (AODA) into law.

The AODA lays out a comprehensive road map to make Ontario accessible to all people through the development, implementation, and enforcement of new, mandatory accessibility standards for some of the most important aspects of people's lives.

Purpose of the Accessibility Plan

The purpose of the Accessibility Plan is to improve opportunities for persons with disabilities and to provide for their involvement in the identification, removal, and prevention of barriers to their full participation in the activities of CMHA-HRB.

Accessibility Plans and Policies for CMHA-HRB

This 2014-21 accessibility plan outlines the policies and actions that CMHA-HRB will put into place to improve opportunities for people with disabilities.

Statement of Commitment

CMHA-HRB 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 preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.



GENERAL REQUIREMENTS

| Accessibility Standard | Description | Action | Responsible Team | Status | Compliance Date |
|--|---|--|------------------|-------------------------|-----------------|
| 3. Establishment of accessibility policies | 3. (1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation. | Develop policies | Leadership team | Complete | January 1, 2014 |
| 4. Accessibility plans | 4. (1) Large organizations shall, a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years | Develop multi-year plan and post on the website. Provide the plan in an accessible format upon request. Review plan and policies as needed or at least every 3 years. | Leadership team | Complete Ongoing | January 1, 2014 |
| 6. Self-serve kiosks | 6. (2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. | N/A | | | January 1, 2014 |
| 7. Training | 7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization. | Provide training to all current staff, volunteers and contractors. Ongoing training will be provided to any new staff, volunteers and contractors. | HR | Ongoing | January 1, 2015 |



Information and Communication Standards

| Accessibility Standard | Description | Action | Responsible Team | Status | Compliance Date |
|--|---|--|---|----------|-----------------|
| 11. Feedback | 11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request. | Provide contact information (email, fax and phone number) on the website for submitting feedback. | Director, Client Services and Program Development | Complete | January 1, 2015 |
| 12. Accessible formats and communications supports | 12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons. | Ensure that documents are available to staff upon request in an alternate accessible format. CMHA-HRB will ensure that it is no additional cost to the individual. | Communications and HR | Ongoing | January 1, 2016 |
| | (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. | Ensure a process to document meeting and discussion with anyone who requests an accessible format or communication support. | Communications and HR | Ongoing | January 1, 2016 |
| | (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Ensure this is posted on our website, at reception and on outgoing communications. | Communications | Ongoing | January 1, 2016 |
| 13. Emergency procedures, plans or public safety information | 13. (1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes | N/A | | | January 1, 2012 |



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| | the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request. | | | | |
| 14. Accessible websites and web content | 14. (2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section. | Ensure new website is compliant. | Communications | Complete | January 1, 2014 (WCAG 2.0 Level A) January 1, 2021 (WCAG 2.0 Level AA) |
| 15. Educational and training resources and materials | 15. (1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given: 1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by, i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or i. Arranging for the provision of a comparable | N/A | | | January 1, 2013 |



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| | <p>resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format.</p> <p>ii. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.</p> | | | | |
| 16. Training to educators | <p>16. (1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.</p> | N/A | | | January 1, 2013 |
| | <p>(2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p> | N/A | | | January 1, 2013 |
| 17. Producers of educational or training materials | <p>17. (1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the</p> | N/A | | | January 1, 2015 |



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| | textbooks available to the institutions. | | | | |
| | (2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions. | N/A | | | January 1, 2020 |
| 18. Libraries of educational and training institutions | 18. (1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request. | N/A | | | January 1, 2015 |
| | (2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1). | N/A | | | January 1, 2020 |



Employment Standard

| Accessibility Standard | Description | Action | Responsible Team | Status | Compliance Date |
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| 22. Recruitment, general | 22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. | Reference accommodation statement in internal, external job postings | HR | Complete | January 1, 2016 |
| 23. Recruitment, assessment of selection process | 23. (1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. | When sending an interview confirmation email or when speaking to candidates ensure that they know accommodations are available upon request. | HR | Ongoing | January 1, 2016 |
| | (2) If a selected applicant requests an accommodation, the employer shall 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. | Work with the applicant to arrange suitable accommodation when requested. | HR | Ongoing | January 1, 2016 |
| 24. Notice to successful applicants | 24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. | Add an accommodation clause to employment agreements or inform candidates when speaking to them. | HR | In progress | January 1, 2016 |
| 25. Informing employees of supports | 25. (1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account | Accessibility Policy and procedures to be reviewed upon hire and on an annual basis. | HR | Ongoing | January 1, 2016 |



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| | an employee's accessibility needs due to disability. | | | | |
| | (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. | Review Accessibility Policy during orientation. | HR | Ongoing | January 1, 2016 |
| | (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. | Announce any changes to the Accessibility policy by email or during an All Staff meeting. | HR | Ongoing | January 1, 2016 |
| 26. Accessible formats and communication supports for employees | 26. (1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace. | Review and assess job descriptions for possible accommodation requests. | HR and Leadership Team | In progress | January 1, 2016 |
| | (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. | Develop a process to document request and discussion of request with supervisor and HR. | HR | In progress | January 1, 2016 |
| 27. Workplace emergency response information | 27. (1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized | Provide a form to employees who have identified a disability about assistance during emergency response to determine who will assist them. | HR and Health and Safety Committee | Complete | January 1, 2012 |



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| | information is necessary and the employer is aware of the need for accommodation due to the employee's disability. | | | | |
| | (2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. | Provide a form to employees who have identified a disability about assistance during emergency response to determined who will assist them. | HR and Health and Safety Committee | Complete | January 1, 2012 |
| | (3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability. | Ensure that an accommodation plan is put together in a reasonable timeframe. | HR and Health and Safety Committee | Complete | January 1, 2012 |
| | (4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. | Continue to review accommodation plan when staff move to another program/location, when CMHA-HRB's emergency policies are reviewed or as needed based on the accommodation plan. | HR and Health and Safety Committee | Complete | January 1, 2012 |
| 28. Documented individual accommodation plans | 28. (1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans | Review Accommodation Policy and procedure. | HR | Ongoing | January 1, 2016 |



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| | for employees with disabilities. | | | | |
| | <p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none">1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.2. The means by which the employee is assessed on an individual basis.3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.5. The steps taken to protect the privacy of the employee's personal.6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.7. If an individual accommodation plan is denied, the manner in | Review Accommodation Policy and procedure. | HR | Ongoing | January 1, 2016 |



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| | <p>which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> | | | | |
| 29. Return to work process | <p>29. (1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work 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; and</p> <p>(b) shall document the process.</p> | <p>Review Sick Leave and Disability and Accommodation policy and procedures and ensure it meets requirements.</p> <p>Review Return to Work form.</p> | HR | In progress | January 1, 2016 |
| | <p>(2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> | <p>Review Sick Leave and Disability and Accommodation policy and procedures and ensure it meets requirements.</p> | HR | In progress | January 1, 2016 |
| 30. Performance management | <p>30. (1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in</p> | <p>Review and Performance Appraisal policy and procedure that accommodation needs will be taken into consideration.</p> <p>Provide the Performance Appraisal template in alternative formats as needed.</p> | HR | In progress | January 1, 2016 |



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| | respect of employees with disabilities. | | | | |
| 31. Career development and advancement | 31. (1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. | Review Employee Development policy and procedure that accommodation needs will be taken into consideration. | HR | In progress | January 1, 2016 |
| 32. Redevelopment | 32. (1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. | Review and Promotions and Transfers policy and procedure that accommodation needs will be taken into consideration. | HR | In progress | January 1, 2016 |