



AODA Multi-Year Accessibility Plan Middlesex-London Health Unit (MLHU)

The Middlesex-London Health Unit (MLHU) 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 and are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (2005).

MLHU has developed and made available upon request, this Multi-Year Accessibility Plan which outlines the actions in place to improve opportunities for people with disabilities. The multi-year plan provides details about the following categories:

- [General Requirements](#)
- [Information & Communication](#)
- [Employment](#)
- [Design of Public Spaces Standard \(Accessibility Standards for the Built Environment\)](#)

Category: General Requirements

Component		Deadline	Requirement	Action(s)	Responsibility	Status
1.	Establishment of Accessibility Policies	1-Jan-2014	<p>Sec. 3(2) Shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities</p> <p>Sec. 3(3) Prepare one or more written documents describing its policies</p>	A third party, <i>Workplace Safety & Prevention Services</i> , was contracted to complete the statement of commitment and policy on the Integrated Accessibility Standards Regulation.	HR Manager and Director, Healthy Organization	Completed
2.	Accessibility Plans	1-Jan-2014	Sec. 4(1) Large organizations shall establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirement under this Regulation.	A third party, <i>Workplace Safety & Prevention Services</i> , was contracted to complete a multi-year accessibility plan.	HR Manager and Director, Healthy Organization	Completed; Revised in 2019 and 2021
3.	Training	1-Jan-2014	Sec. 7 Every obligated organization shall ensure training is provided on the requirements of the accessibility standards referred to in the Regulation and on the Human Rights Code as it pertains to person with disabilities	<p>All employees, board of health members and volunteers, all persons who participate in developing the organizations polices; and all other persons who provide goods, services or facilities on behalf of the organization will be trained. Training will be appropriate to the duties of the individual being trained.</p> <p>The Ontario Human Rights Commissions videos, <i>Working Together: The Code and AODA</i> will be used to train all of those who need to be trained. The accessibility report was before the deadline of December 31, 2014.</p>	HR Manager and, Director, Healthy Organization	Completed; mandatory training is ongoing as part of the onboarding process for all new hires.

4.	Accessibility Report	1-Jan-2015	Sec. 86.1 Organizations shall file the accessibility report according to the following schedule: every three years in the case of large organizations	The accessibility reports were filed in accordance with the established deadlines of December 31, 2014, December 31, 2017, December 31, 2020 – Extended to June 30, 2021, and December 31, 2023.	HR Manager and Director, Healthy Organization	Completed / Ongoing
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Category: Information & Communication

Component	Deadline	Requirement	Action(s)	Responsibility	Status	
1.	Feedback from Customers & Employees	1-Jan-2014	Sec. 11 Receiving and providing feedback in an accessible format	<p>Clients may provide feedback to MLHU by submitting a Customer Feedback Form, calling 519-663-5317 ext. 2512 or emailing accessibility@mlhu.on.ca. For employees, MLHU uses online surveys to elicit feedback from employees. Employees are given the opportunity to request accommodation when completing surveys. Employees may also send feedback via email to accessibility@mlhu.on.ca.</p>	Human Resources Manager and/or Director, Healthy Organization	Completed
2.	Accessible Formats and Communication Supports	1-Jan-2015	Sec. 12 Information about their goods and services or facilities	<p>MLHU shall upon request provide or arrange for the provision of accessible formats for persons with disabilities.</p> <p>Medical brochures are not controlled by the MLHU. Documents produced in-house (i.e. Fact Sheets) are all made available in Microsoft and are available online.</p>	Communications Manager	Completed
			Sec. 12 Communication Supports	Communication supports will be provided in a timely manner which consider the person's needs. The cost to provide this service shall not be incurred by the client.	Communications Manager	Completed

				The client will be consulted with to determine the suitability of a communication support. A list of local service providers will be contacted to facilitate this process.		
3.	Unconvertible Information	1-Jan-2015	Sec. 12 Examples: blueprints or x-rays	MLHU uses documents produced by various Ontario Ministries such as the Ontario Ministry of Health and Long-Term Care and Ontario Ministry of Community and Social Services. These documents are not under the control of the Health Unit and therefore cannot be provided in an accessible format.	Communications Manager	N/A
4.	Meeting requests in a timely manner	1-Jan-2015	Sec. 12 HTML, MS Word, accessible electronic formats	In some cases, MLHU will be able to provide the information or communication supports quickly. In other cases, more time will be required due to the complexity of the document/report and resources or internal capacity of the organization. At most, clients will receive accessible documents or communication supports within 10 business days.	Communications Manager	Completed
5.	Posting Requirements	1-Jan-2015	Sec. 12 Public must be notified about accessible formats & communication supports	The Health Unit's website includes an accessibility page to communicate all AODA requirements.	Communications Manager	Completed
6.	Emergency Procedures / Plan or Public Safety Information	1-Jan-2012	Sec. 13 If publicly available must also provide in an accessible format. i.e.: evacuation procedures, floor plans, Health & Safety information	Any emergency procedures/plan or public safety information MLHU makes publicly available will be made available in an accessible format upon request.	Emergency Preparedness Manager	Completed

7.	Accessible Websites & Web Content	N/A	Sec. 14 Applies to new internet websites & content WCAG 2.0 (World Wide Web Consortium web content accessibility guidelines at Level A)	MLHU does not have plans for a significant refresh (more than 50% of content, design or technology) of its website or a new URL at this time.	Communications Manager	N/A
		1-Jan-2021	Sec. 14 All internet websites and web content to comply with WCAG 2.0 (World Wide Web Consortium web content accessibility guidelines at Level AA)	MLHU's website is managed by a web development vendor and has assured it is compliant with the WCAG 2.0 Level AA standards.	Communications Manager	Completed

Category: Employment

Component	Deadline	Requirement	Action(s)	Responsibility	Status
1. Recruitment, Assessment and Selection	1-Jan-2014	Sec. 22 Notify employees and public about availability of accommodation(s) for applicants in the recruitment process	<p>MLHU conducts its own recruitment, assessment and selection. This process is guided by collective agreements with the Ontario Nurses Association (ONA) and Canadian Union of Public Employees (CUPE). When posting positions internally or externally, information about the availability of accommodations is included.</p> <p>The following wording is included to all internal and external postings: <i>"MLHU is committed to providing accommodations based on any human rights protected ground throughout the recruitment and selection process. If you require accommodation, please notify us if you are contacted for an interview and we will work</i></p>	Human Resources Manager and/or Director, Healthy Organization	Completed

				<i>with you to meet your needs. Should you require accommodation in the application process, please contact our Human Resources Department at 519-663-5317 or at accessibility@mlhu.on.ca .”</i>		
		1-Jan-2014	Sec. 23 Notify applicants who have been invited to participate in a recruitment, assessment or selection process that accommodations are available	MLHU notifies applicants when they are called for an interview about the availability of accommodations during the selection process.	Human Resources Manager	Completed
		1-Jan-2014	Sec. 24 Offers of Employment - notify successful applicant of policies for accommodating employees with disabilities	MLHU notifies successful applicant(s) of their policies for accommodating employees with disabilities. This is done for all new hires who receive written offers of employment.	Human Resources Manager	Completed
		1-Jan-2014	Sec. 25 Informing Employees of Supports - all employees must be informed of policies used to support employees with disabilities (existing employees, new hires and when there is a change to the policy)	MLHU informs all employees of their policies for supporting employees with disabilities. Notification may take several forms such as meetings, training, policy manager or email.	Human Resources Manager	Completed
2.	Accessible formats and communication supports for employees	1-Jan-2014	Sec. 26 Must provide in an accessible format information needed to perform the job and information which is generally available to employees in the workplace	MLHU will, upon request, consult with an employee with a disability to determine which accessible formats or communications supports they require to perform the duties of their job. An individual accommodation plan will be completed, and the accessible formats and/or communication supports that will be provided to the employee will be noted in the plan.	Human Resources Manager	Completed
3.	Workplace emergency response information	1-Jan-2012	Sec. 27 Provide individualized workplace emergency response information; prepare for the specific needs employees with disabilities may have in emergency situations	MLHU creates individualized workplace emergency response plans for employees who have a disability and require accommodation(s)/supports to evacuate their workplace in an emergency. With the employee's consent, the person designated to provide assistance to the employee will be	Human Resources Manager	Completed

				provided with the necessary information to assist the employee with the disability. Emails, , training and meetings have been held as appropriate to communicate this requirement to staff.		
4.	Documented individual accommodation plans	1-Jan-2014	Sec. 28 Develop and document individual accommodation plans for employees with disabilities; employee involvement, outside medical or expert evaluation; review frequency	MLHU creates individual accommodation plans for any employee for whom they have been made aware has a disability. There may be times when MLHU will initiate a dialogue to offer assistance and accommodation for employees who are clearly unwell or perceived to have a disability. The employee will be included in the development of the plan. MLHU may seek outside medical or other expert evaluations in order to provide appropriate supports. The plan will be reviewed when there is a change in the employee's disability or job.	Human Resources Manager	Completed
5.	Return to Work process	1-Jan-2014	Sec. 29 Develop and have in place a RTW process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work	MLHU has in place a return to work (RTW) 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. The return to work process will be documented. Current WSIB RTW processes will be modified for this process. If an individual's injury is covered by the return to work provisions of the Workplace Safety and Insurance Act, then that Act's return to work process would apply.	Human Resources Manager	Completed
6.	Performance Management	1-Jan-2014	Sec. 30 Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, during the performance management process in respect to employees with disabilities	Under the AODA, the term performance management means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success. MLHU will consider the accessibility needs of employees with disabilities in the area of performance management.	Human Resources Manager	Completed

7.	Career Development and Advancement	1-Jan-2014	Sec. 31 Includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an org. that may be higher in pay, provide greater responsibility or be at a higher level in the org. or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them	MLHU will take into account what accommodations employees with disabilities may need to succeed elsewhere in the organization or to take on new responsibilities in their current position. If the employee has an individual accommodation plan in place, the plan will be updated to reflect the changes in their new responsibilities.	Human Resources Manager	Completed
8.	Redeployment	1-Jan-2014	Sec. 32 Reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization	<p>In the event that MLHU will initiate a redeployment process, it will consider the accessibility needs of employees with disabilities when moving them to other positions within the organization. If the employee has an individual accommodation plan, the plan will be reviewed and updated to reflect the changes in their new responsibilities.</p> <p>MLHU strives to always accommodate an individual in their own job first. If due to the restrictions and limitations of the individual and the program needs that this is not possible, we will search for a comparable position within the organization.</p>	Human Resources Manager	Completed

Category: Design of Public Spaces Standard (Accessibility Standards for the Built Environment)

Component	Deadline	Requirement	Action(s)	Responsibility	Status
1. Exterior Paths of Travel	1-Jan-2017	Sec. 80.21 Applies to newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience. O. Reg. 413/12, s. 6.	MLHU has not constructed or redeveloped an exterior path of travel since January 1, 2017. Should MLHU construct or redevelop an exterior path of travel in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.	Procurement & Operations Manager	N/A
2. Accessible Parking	1-Jan-2017	Sec. 80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain; the off-street parking facilities meet the requirements set out in this Part. O. Reg. 413/12, s. 6.	MLHU has not constructed or redeveloped any accessible parking spaces since January 1, 2017. Should MLHU construct or redevelop accessible parking spaces in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.	Procurement & Operations Manager	N/A
3. Obtaining Services	1-Jan-2017	Sec. 80.40 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas. O. Reg. 413/12, s. 6.	Effective 2020, MLHU constructed new service counters at our new premise. For guidance on this requirement, the CSA B651 – 12 have been referenced to ensure service counters are at least 680 mm or 27 inches in height or a clear opening.	Procurement & Operations Manager	Completed

4.	Maintenance of Accessible Elements	1-Jan-2017	<p>Sec. 80.44 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces</p> <p>2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6.</p>	<p>MLHU'S lease hold agreements require the leaser to ensure all assessible elements in common areas are maintained.</p> <p>Any accessible elements MLHU is solely responsible for have maintenance schedules as required under other legislation.</p> <p>Procedures for dealing with temporary disruptions have been established and communicated to employees.</p>	Procurement & Operations Manager	Completed
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