

**CANADIAN FOUNDATION FOR HEALTHCARE IMPROVEMENT
GOVERNANCE POLICIES**

Subject: Accessibility for Ontarians with Disabilities	Policy No.: GP- C5
Category: Human Resources	Approved: September 29, 2011
Authority: President and CEO	Last Amended: March 2019
Reviewed by: President and CEO	Next Review: March 2020

Preamble

The Canadian Foundation for Healthcare Improvement (CFHI) is incorporated as a not-for-profit corporation under federal legislation, and its directors are responsible for managing and supervising the activities and affairs of the Corporation. In discharging this mandate, the Board must comply with the Foundation’s governing documents¹ as well as the rules established under the common law governing directors' duties. In addition, and in accordance with By-law Number 1 of the Corporation, the Board of Directors has appointed a president and chief executive officer who has general charge of CFHI’s business affairs, is responsible for the overall day-to-day management of CFHI, and has such authority as prescribed by the Board.

Accordingly, a policy has been developed to provide direction with regards to the responsibilities of employees, volunteers and others who deal with the public or other third parties in Ontario on behalf of CFHI in providing goods and services to people with disabilities in compliance with the *Accessibility for Ontarians with Disabilities Act* (AODA) (2005) and to meet the applicable requirements of the *Integrated Accessibility Standards, Ontario Regulation* (IASR) for CFHI, namely 1) the *Information and Communications Standard*, which applies to the provision of information and communications services and materials for people with disabilities, 2) the *Employment Standard*, which applies to the provision of accessible employment services for persons with disabilities and 3) the *Customer Service Standard*, which applies to the provision of goods and services to the public or other third parties.

¹ The Foundation’s governing documents include the legislation under which CFHI exists and operates, its constating documents (articles of continuance and by-laws), funding/contribution agreements, and internal governance policies.

1. Policy

CFHI is supportive of the goal to make Ontario accessible by 2025 and therefore will ensure compliance with the AODA is achieved through the established objectives outlined below.

2. Statement of Commitment

CFHI believes in equal opportunity and is committed to providing a barrier-free environment that allows all people to maintain their independence and dignity. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)* and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

3. Objectives

3.1 To give people with disabilities the same opportunity to access our goods and services and allow them to benefit from the same level of service, in the same place and in a similar way as others.

3.2 All information, communication, customer service and employment services provided by CFHI shall follow the principles of dignity, independence, integration and equal opportunity.

4. Definition

4.1 Disability: As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the Ontario *Human Rights Code*, refers to:

4.1.1 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 coordination, 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,

4.1.2 A condition of mental impairment or a developmental disability,

4.1.3 A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

4.1.4 A mental disorder, or

4.1.5 An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

4.2 Service Animal:

4.2.1 Any animal that is used by a person with a disability for reasons relating to their disability, or

4.2.2 If it is not readily apparent that the animal satisfied (a), any animal for which a person with a disability provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to their disability.

4.3 Assistive device:

4.3.1 A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

4.4 Support person:

4.4.1 In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

5. General Requirements

5.1 CFHI will develop, implement and maintain policies governing how it will achieve accessibility through the requirements under the IASR.

- 5.2 CFHI will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.
 - 5.3 CFHI will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website. CFHI will review and update its accessibility plan once every five (5) years.
6. Procuring or Acquiring Goods and Services, or Facilities
 - 6.1 CFHI will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.
7. Training Requirements
 - 7.1 CFHI will provided training for its employees and volunteers regarding the IASR and the *Ontario Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing CFHI's policies, and all other persons who provide goods, services or facilities on behalf of CFHI.
 - 7.2 Training will be provided as soon as is practicable and on an ongoing basis to new employees and as changes to CFHI's accessibility policies occur.
8. Records
 - 8.1 CFHI will maintain records on the training provided, when it was provided and the number of employees that were trained.
9. Information and Communications Standard:
 - 9.1 Accessible Formats and Communication Supports
 - 9.1.1 Unless deemed unconvertible, CFHI will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and

communication supports will be provided in a timely manner and at no additional cost to the individual.

9.1.2 CFHI will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

9.1.3 CFHI will make the availability of accessible formats and communication supports publicly known.

9.2 Accessible Websites and Web Content

9.2.1 CFHI will work towards ensuring that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.

10. The Employment Standard

10.1 Recruitment, Assessment and Selection

10.1.1 CFHI will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, CFHI will consult with the applicant and provide or arrange for suitable accommodation. Please refer to CFHI's Accommodation Policy.

10.1.2 Successful applicants will be made aware of CFHI's policies and supports for accommodating people with disabilities.

10.2 Accessible Formats and Communication Supports for Employees

10.2.1 CFHI will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

10.2.2 If an employee with a disability requests it, CFHI will provide or arrange for the provision of accessible formats and communication supports when information is needed in order to perform their job and when information is needed that is generally available to all employees in the workplace.

10.2.3 CFHI will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

10.3 Workplace Emergency Response Information

10.3.1 Where required, CFHI will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

10.3.2 This information will be reviewed when:

10.3.2.1 The employee moves to a different physical location in the organization;

10.3.2.2 The employee's overall accommodation needs or plans are reviewed; and/or

10.3.2.3 CFHI reviews general emergency response policies

10.4 Documented Individual Accommodation Plans

10.4.1 CFHI must develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include the following elements:

10.4.1.1 The ways in which the employee can participate in the development of the plan;

10.4.1.2 The means by which the employee is assessed on an individual basis;

- 10.4.1.3 The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- 10.4.1.4 The ways that an employee can request the participation of a representative from the workplace for the creation of the accommodation plan;
- 10.4.1.5 The steps taken to protect the privacy of the employee's personal information;
- 10.4.1.6 The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- 10.4.1.7 The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- 10.4.1.8 The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

10.4.2 The individual accommodation will also:

- 10.4.2.1 Include information regarding accessible formats and communication supports upon request;
- 10.4.2.2 Where needed, include individualized workplace emergency response information; and
- 10.4.2.3 Outline all other accommodation provided.

10.5 Performance Management and Career Development and Advancement

- 10.5.1 CFHI will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required.

10.6 Return to Work

10.6.1 CFHI will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

10.6.2 The return to work process will outline the steps CFHI will take to facilitate the employee's return to work and shall use documented individual accommodation plans.

10.7 Redeployment

10.7.1 The accessibility needs of employees with disabilities will be taken into account in the event of redeployment. Individual accommodation plans will be consulted, as required.

11. Customer Service Standard

11.1 Communication

11.1.1 CFHI is committed to communicating with people with disabilities in a manner that takes into account their disability. CFHI will make best efforts to communicate with people with disabilities in the format that is most suitable for each individual, such as by telephone, email or regular mail, or in person.

11.2 Assistive Devices

11.2.1 CFHI is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from its goods and services. CFHI will strive to accommodate people with disabilities who use assistive devices and to offer alternative service methods in order to ensure equal access to its goods and services.

11.3 Support Persons and Use of Service Animals

11.3.1 Some people with disabilities rely on support persons for certain assistance. Persons with a disability will be allowed to be accompanied by their support person while at CFHI. The support person must agree to follow our workplace guidelines on confidentiality as outlined in our Code of Conduct while assisting the person with a disability secure the required goods or services. Where admission fees are charged for an event, such as a seminar, CFHI will provide notice ahead of time on what admission fee, if

any, will be charged for a support person who accompanies a person with a disability.

11.3.2 Any person with a disability who is accompanied by a service animal will be allowed to enter the parts of CFHI's premises that are open to the public and other third parties, unless the service animal is otherwise excluded by law from the premises in which case CFHI will use all other available measures to ensure that the person with a disability is able to obtain, use or benefit from CFHI's goods and services. The service animal is to accompany the person at all times.

11.3.3 If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, CFHI will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Ontario Human Rights Code* and the *Ontario Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

11.4 Notice of Temporary Disruption in Service

11.4.1 In the event that there is a planned or unexpected disruption to a particular facility or service used to allow a person with a disability to access CFHI's goods and services, CFHI will post a notice as soon as practicable in a conspicuous place on the premises of the affected building or by other reasonable methods in the circumstances (such as on its website), to identify the reason for the disruption, its anticipated duration and a description of alternative services, if available.

12. Feedback Process

12.1 CFHI expects to provide our services in a way so that those with a disability may still gain access. Feedback on the success/challenge of this is encouraged and can be made by contacting CFHI as follows:

Canadian Foundation for Healthcare Improvement
c/o Accessibility
150 Kent Street, Suite 200
Ottawa, Ontario K1P 0E4
Tel: 613-728-2238
Fax: 613-728-3527
Email: accessibility@CFHI.ca
Website: www.CFHI-FCASS.ca

12.2 Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to an CFHI employee.

12.3 All feedback will be directed to the Vice-President, Corporate Services for response within 10 business days. Customers who provide formal feedback will receive an acknowledgment of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

13. Documentation

13.1 Documentation regarding accessibility at CFHI, such as, but not limited to, the feedback process, the policy, and any accessibility report, if appropriate, will be maintained on the CFHI web site and provided to individuals, upon request, in the appropriate format.

14. Reporting

14.1 Online compliance reporting will be submitted by the Vice-President, Corporate Services, as required.

15. Accountabilities and Responsibilities

15.1 The President's Executive Committee (PEC) is responsible for the following:

- Sets and implements the overall corporate administrative policy and program direction;
- Monitors and ensures consistency in the application of the policy across CFHI;
- Reviews and approves recommendations arising from the feedback received on the policy;
- Maintains and reviews the policy annually; and
- Receives and reviews all feedback related to customer service accessibility and ensures appropriate follow-up with those providing feedback.

15.2 Directors are responsible for the following:

- Oversee the consistent application of the policy and the related processes within the department or branch and with third-party service providers;
- Foster an environment that reflects the purpose of the policy.

- 15.3 Managers and Supervisors are responsible for the following:
- Foster an environment that supports the purpose of the policy; and
 - Work in compliance with the policy and related processes.
- 15.4 The Human Resources department coordinates or administers mandatory training for employees on accessibility standards, including tracking of training provided.
- 15.5 The Vice-President, Corporate Services coordinates assessments of the impact of the applicable legislation on CFHI services and service delivery and coordinates the preparation of the documentation as required by the applicable legislation.
- 15.6 Employees, volunteers, and third-party contractors must:
- Work in compliance with the policy and related processes; and
 - Attend training and education sessions on accessibility, as required.