

2021-2026 Accessibility Plan Bruyère



Prepared by

Quality, Patient Safety
and Risk Management

This plan was inspired by the Ottawa Hospital's
Multi-year Accessibility Plan 2018-2022 with gratitude

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Bruyère 

Message from the President & CEO



Guy Chartrand
President and CEO

Bruyère plays a critical role in our region's health care system, providing a wide range of services within our hospital campuses, our long-term care homes, and in supportive and independent living for older adults and vulnerable populations.

Inspired by the values and legacy of Mother Élisabeth Bruyère, our programs and services build on 175 years of commitment to compassionate patient-centred care. Steeped in our mission is a commitment to removing barriers to access for patients, residents, visitors, staff, and volunteers across our campuses.

In line with the Accessibility for Ontarians with Disabilities Act (AODA), this is our second multi-year accessibility plan. In consultation with our accessibility committee and our Patient and Family Advisory Committee, we have set out our goals to improve the accessibility of our organization so that everyone can access the information and services they need from us when they need it most.

We have also been contributing to reducing the barriers that stop people from participating in arts and culture. CJ Fleury, our first Artist-In-Residence at Bruyère, organized a month-long art-based program in 2020 that won Spotlight Award for accessibility from Ontario's Culture Days.

The [*Be Moved by Art at Bruyère*](#) was a program featuring an online exhibition and a self-guided outdoor art tour. The shows featured 2D and 3D works created by our very own patients and caregivers, new photography, and playful ground-murals that prioritized community collaboration and participation.

We welcome your feedback as we embark on a renewed plan for the next five years and reaffirm our commitment to serving older adults and those with disabilities in a way that allows them to maintain their dignity and independence.



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Aim

This plan outlines identified barriers to accessibility for persons with disabilities and how they have been or will be addressed in the next five years. It explains how barriers are identified and prioritized, as well as who is responsible for their maintenance. The Quality, Patient Safety and Risk Management department oversees these operations and drafted the plan.

Among our clients who may have disabilities are patients, residents, family members, friends, employees, physicians, students, volunteers, visitors, and members of the community.

Among our responsibilities is to remove barriers in customer service, built environment, communication and information, transportation, and employment.

Bruyère's Senior Strategy Team reviews annual accessibility reports prepared by the Director of Quality, Patient Safety and Risk Management describing our compliance with the legal provisions according to Ontarians with Disabilities Act (ODA 2001). The Integrated Accessibility Standards Regulation (IASR) of AODA became law in June 2011, and now requires hospitals to produce multi-year accessibility plans that include targets and timelines for compliance with the multiple requirements of the IASR, in addition to their activities relating to both the Customer Service Standard of AODA and locally-identified barriers in by-laws, policies, programs, practices and services.

Bruyère will provide public notice of the availability of documents as required by the Accessibility Standards for Customer Service on our external and internal websites.

Objectives

This plan:

- Describes the process by which Bruyère implements the accessibility plan to remove and prevent barriers to people with disabilities, and
- Describes how Bruyère makes its accessibility plan available to the public.



About Bruyère

Bruyère is a multi-site academic health care organization that is maximizing quality of life and helping people stay and return home. We deliver a wide variety of services in aging and rehabilitation, medically complex, palliative, residential and primary care.

Our research leads to constant innovation in the services we provide with a focus on providing care that promotes independence. This work is enhanced by our Foundation that shares our story and raises funds with the support of our generous community.

Our mission

Driven by learning, research and innovation, our mission is to lead an integrated system of care that maximizes your quality of life and health potential.

We are an academic health care organization committed to providing compassionate and holistic care, respecting the dignity and diversity of all. As a Catholic organization, we are inspired by the values and legacy of Mother Élisabeth Bruyère. Our services in aging and rehabilitation, medically complex, palliative, residential and primary care respond to your needs throughout your life.

Vision

TOGETHER. Making each life better.

Barrier identification methods

The Quality, Patient Safety and Risk Management (QPR) department reports progress on accessibility issues to the Senior Strategy Team at their monthly meetings. QPR convenes an ad hoc group with appropriate department members to ensure compliance with the AODA and IASR. The group meets when required to monitor progress of the removal of identified barriers and oversees and monitors how the organization is complying with the legislation.

Patient satisfaction surveys contain an open-ended question asking about any accessibility issues.

Priorities for 2021-26:

Our priorities for the next five years are to meet and maintain the new **Integrated Accessibility Standards Regulation (IASR)** requirements. From the extensive list of issues in the IASR guidelines, we have addressed or have plans to address all the requirements. The following links provide associated requirements:

<http://www.ontario.ca/laws/regulation/110191>

<https://dr6j45jk9xcmk.cloudfront.net/documents/4845/guidelines-to-iasr-english.pdf>

Review and monitoring process

The Director of Quality, Patient Safety and Risk Management periodically receives progress reports from the various sectors responsible for follow-up on the identified barriers. The director meets with the respective department when required to review progress for reporting to the Senior Strategy Team.

Communication of the plan

The accessibility plan is made available to the public through posting on the Bruyère external website (www.bruyere.org). Upon request, the document is available in alternative formats such as large print.

Workplan 2021-2026



IASR Section 3: Establishment of Accessibility Policies

- Requirement:
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.
 - How it is addressed:
Policy PHIL 05 *Accessibility Standards for Customer Service for Persons with Disabilities*, last revised April 2016.
- ✓ Status:
This policy will be reviewed in 2023.
- Requirement:
Include statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner.
 - How it is addressed:
This is included in Policy PHIL 05 *Accessibility Standards for Customer Service for Persons with Disabilities*.
- Requirement:
Prepare one or more written documents describing its policies; and make the documents publicly available, and shall provide them in an accessible format upon request.
 - How it is addressed:
Policy PHIL 05 *Accessibility Standards for Customer Service for Persons with Disabilities* is on both the internal, external websites.

IASR Section 4: Accessibility Plans

- Requirement:
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. Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request and review and update the accessibility plan at least once every five years.
 - How it is addressed:
This document is evidence of compliance

Posted on internal & external websites

Policy PHIL 05 *Accessibility Standards for Customer Service for Persons with Disabilities* explains that multi-year accessibility plan is accessible upon request

Review last completed in 2020
- ✓ Status:
This plan is to be reviewed and revised as needed on a yearly basis.
- Requirement:
Establish, review and update their accessibility plans in consultation with persons with disabilities and, if they have established an accessibility advisory committee, they shall consult with the committee.
 - How it is addressed:
The plan has been reviewed with persons with disabilities (employee and the Patient and Family Advisory Committee).

- Requirement:
Prepare an annual status report on the progress of measures taken to implement the strategy and post the status report on their website, if any, and provide the report in an accessible format upon request.
 - How it is addressed:
Annual report is posted on external website in HTML, with directions for accessing the financial statements in an accessible format upon request.

IASR Section 5: Procuring or Acquiring Goods, Services, or Facilities

- Requirement:
Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so; and, if it is not practicable to incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, it shall provide, upon request, an explanation.
 - How it is being addressed:
Terms of Reference for the Product Evaluation and Standardization (PE&S) Committee were amended to ensure we are meeting accessibility needs for employees with disabilities.

IASR Section 7: Training

- Requirement:
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.

- How it is addressed:
Policy PHIL 05 *Accessibility Standards for Customer Service for Persons with Disabilities* outlines training for enhancing accessibility.

Online module available for employees started in May 2012:

- For employees with visual impairment, narrations of modules are true to the visual content.
- Modules on the Learning Management System are accessible at work or at home.
- Module scripts are available for employees with hearing impairments.
- Module pages can be enlarged with the zoom.

- Requirement:
The training on the requirements of the accessibility standards and on the Human Rights Code.

- How it is being addressed:
Completion of the "Accessible Client Service Module" is part of the General Orientation curriculum. Revised module was launched in June 2020.

The module on accessibility has been completed by 2327 completed of 2803 active staff (83%). Tracking is done through the organization's Learning Management System.

IASR Section 11: Feedback

- Requirement:
Processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.

- How it is being addressed:
Policies ADMIN 02 *Complaints, Concerns and Compliments from Patients and Families*, BRUYERE VILLAGE 04 *Complaints* and PHYSICIAN 02 *Physician Code of Conduct and Complaints Procedure* outline processes responding to complaints and concerns.

PHYSICIAN 02 Physician Code of Conduct and Complaints Procedure was revised in 2022.

External website has a Contact Us section and a Comments section with phone numbers and emails for departments and programs.

- ✓ Status:
BRUYERE VILLAGE 04 *Complaints* will be revised in 2023.

- Requirement:
Customer Service Standard Feedback Requirement: making feedback processes available to the public in person, by telephone, by writing, by email.

- How it is being addressed:
External website has a *Contact Us* section and a Comments section that list telephone numbers and emails for departments and programs.

The website also has information about the Office of Patient Experience which aims to enhance the overall quality of care at Bruyère. The website identifies the individual, and their contact information, who works with patients and families to ensure a more positive health care experience and who welcomes comments and feedback.

The patient handbook includes contact information, including to the Office of Patient Experience and the client relations advisor.

Patient experience surveys are conducted with patients who choose to participate, either by themselves or with staff assistance.

Family experience surveys are mailed, with paper copies and self-addressed stamped envelopes. Cover letter includes a link to complete it online if that is the preferred method. The program director's telephone number is provided.

- Requirement:
Employee Feedback

- How it is being addressed:
Employees are asked to complete anonymous employee feedback surveys every two years, administered externally. Various formats are available upon request.

IASR Section 12: Accessible Formats and Communication Supports

- Requirement:
Upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability; and at a cost that is no more than the regular cost charged to other persons.

- How it is being addressed:
Policies ADMIN 02 Complaints, Concerns and Compliments from Patients and Families, BRUYERE VILLAGE 04 Complaints and PHYSICIAN 02 Physician Code of Conduct and Complaints Procedure outline processes responding to complaints and concerns.

The external website has a *Contact Us* section with telephone numbers and emails for departments and programs and a *Comments* section inviting comments and suggestions and contact information.

- Requirement:
Consult with the person making the request in determining the suitability of an accessible format or communication support.

IASR Section 13: Emergency Procedure, Plans or Public Safety Information

- How it is being addressed:
Policies ADMIN 02 *Complaints, Concerns and Compliments from Patients and Families*, BRUYERE VILLAGE 04 *Complaints* and PHYSICIAN 02 *Physician Code of Conduct and Complaints Procedure* outline processes responding to complaints and concerns.

The external website has a *Contact Us* section with telephone numbers and emails for departments and programs and a *Comments* section inviting comments and suggestions and contact information.

- Requirement:
Notify the public about the availability of accessible formats and communication supports.

- How it is being addressed:
Policies ADMIN 02 *Complaints, Concerns and Compliments from Patients and Families*, BRUYERE VILLAGE 04 *Complaints* and PHYSICIAN 02 *Physician Code of Conduct and Complaints Procedure* outline processes responding to complaints and concerns.

The external website has a *Contact Us* section with telephone numbers and emails for departments and programs and a *Comments* section inviting comments and suggestions and contact information.

- Requirement:
Prepares emergency procedures, plans or public safety information and makes it available to the public in an accessible format and with communication supports upon request.

- How it is being addressed:
Emergency procedures, plans and information are available on the internal and external websites, and in written format for employees. All are currently being revised.

An initial review of the website flagged important accessibility issues. There is currently a website audit and redesign planned for 2021-22. Within this process, the communications department will conduct an audit to ensure the content and platform are adapted to meet the WCAG 2.0 Level AA standards, with the exception of those excluded by AODA.



IASR Section 14: Accessible Websites and Web Content

- Requirement:
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.

- How it is being addressed:
An initial review of the website flagged important accessibility issues. There is currently a website audit and redesign planned for 2021-22. Within this process, the communications department will conduct an audit to ensure the content and platform are adapted to meet the WCAG 2.0 Level AA standards, with the exception of those excluded by AODA.

- Requirement:
Meet the requirements of this section in accordance with the following schedule:
 - By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.
 - By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than,
 - success criteria 1.2.4 Captions (Live), and
 - success criteria 1.2.5 Audio Descriptions (Pre-recorded).

- How it is being addressed:
An initial review of the website flagged important accessibility issues. There is currently a website audit and redesign planned for 2021-22. Within this process, the communications department will conduct an audit to ensure the content and platform are adapted to meet the WCAG 2.0 Level AA standards, with the exception of those excluded by AODA.

IASR Section 22: Recruitment General (January 2014)

- Requirement:
Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

- How it is being addressed:
Policies RH.HR 1.10 Position Management and RH.HR 1.2 Staffing of Management Positions outlines steps to ensure non-discrimination in hiring process.

Policy PHIL 05 Accessibility Standards for Customer Services for Persons with Disabilities outlines accessibility policies and procedures.

The paragraph, *"Bryère is committed to developing inclusive, barrier-free selection processes and work environments. If contacted regarding this competition, please advise the departmental official of the accommodation measures which must be taken to enable you to be assessed in a fair and equitable manner"* is on all job postings (internal and external).

- ✓ Status:
Policies RH.HR 1.10 Position Management and RH.HR 1.2 Staffing of Management Positions will be revised in 2023.

IASR Section 23: Recruitment, Assessment or Selection Process

- Requirement:
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.

- How it is being addressed:
Policies RH.HR 1.10 Position Management and RH.HR 1.2 Staffing of Management Positions, outline steps to ensure non-discrimination in hiring process.

The paragraph, *“Bruyère is committed to developing inclusive, barrier-free selection processes and work environments. If contacted regarding this competition, please advise the departmental official of the accommodation measures which must be taken to enable you to be assessed in a fair and equitable manner”* is on all job postings (internal and external).

- Requirement:
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.

- How it is being addressed:
Policies RH.HR 1.10 Position Management and RH.HR 1.2 Staffing of Management Positions, outline steps to ensure non-discrimination in hiring process.

The paragraph, *“Bruyère is committed to developing inclusive, barrier-free selection processes and work environments. If contacted regarding this competition, please advise the departmental official of the accommodation measures which must be taken to enable you to be assessed in a fair and equitable manner”* is on all job postings (internal and external).

IASR Section 24: Notice to Successful Applicants

- Requirement:
When employers make offers of employment, they must notify the successful applicants of their policies for accommodating employees with disabilities. Employers have the flexibility to determine how they will notify successful applicants of their policies for accommodating employees with disabilities.

- How it is being addressed:
Policies RH.HR 1.10 *Position Management* and RH.HR 1.2 *Staffing of Management Positions*, outline steps to ensure non-discrimination in hiring process.

We have policies to address and provide support with respect to accommodating employees with disabilities:

- RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability. This policy was revised in 2022.
- RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability. This policy was revised in 2022.
- RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability. This policy was revised in 2022.

We have a provision in offer letters to notify new employees of policies to accommodate employees with disabilities.

Policy PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities*: outlines accessibility policies and procedures.

IASR Section 25: Informing Employees of Support

- Requirement:
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 an employee's accessibility needs due to disability.

- How it is being addressed:
Policies RH.HR 1.10 *Position Management* and RH.HR 1.2 *Staffing of Management Positions*, outline steps to ensure non-discrimination in hiring process.

Policy PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities*: outlines accessibility policies and procedures.

We have policies to address and provide support with respect to accommodating employees with disabilities:

- RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.
- RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.
- RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability.

- Requirement:

Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.

- How it is being addressed:
Policies RH.HR 1.10 *Position Management* and RH.HR 1.2 *Staffing of Management Positions* outline steps to ensure non-discrimination in hiring process.

Policy PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities* outlines accessibility policies and procedures.

We have policies to address and provide support with respect to accommodating employees with disabilities:

- RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.
- RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.
- RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability.

All new employees attend corporate orientation which includes the provision of information regarding the employers' policies and where they can be accessed.

- Requirement:

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.

- How it is being addressed:
Policies RH.HR 1.10 *Position Management* and RH.HR 1.2 *Staffing of Management Positions*, outline steps to ensure non-discrimination in hiring process.

Policy PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities*: outlines accessibility policies and procedures.

We have policies to address and provide support with respect to accommodating employees with disabilities:

- RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.
- RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.
- RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability.

Bulletins regarding new and revised policies are posted on the employers' internal web site.

IASR Section 26: Accessible Formats and Communication Supports for Employees (January 2014)

- Requirement:
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 information that is needed in order to perform the employee's job and information that is generally available to employees in the workplace.

- How it is being addressed:
Policy PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities* outlines accessibility policies and procedures.

RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.

RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.

RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability.

- Requirement:
The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.
 - How it is being addressed:
Policy PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities* outlines accessibility policies and procedures.

RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.

RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.

RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability.

IASR Section 27: Workplace Emergency Response Information

- Requirement:
Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability
 - How it is being addressed:
Emergency procedures, plans and information are available on the internal website, and in written format for employees. All are currently being revised.

Emergency Preparedness plans includes sections for staff with disabilities.
- ✓ Status:
By December, 2023, ensure that Bruyère has document(s) confirming that they provide individualized workplace emergency response information to employees with disabilities and persons designated to provide assistance to the employee.
- Requirement:
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.

► How it is being addressed:
Emergency procedures, plans and information are available on the internal website, and in written format for employees. All are being revised currently.

Emergency Preparedness plans includes sections for staff with disabilities.

• Requirement:

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.

► How it is being addressed:

In 2022, it was confirmed that Bruyère's individualized workplace emergency response information be provided as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.

• Requirement:

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 © when the employer reviews its general emergency response policies.

✓ Status:

By December 2023, ensure that Bruyère has documents confirming that they review the individualized workplace emergency response information,

- when the employee moves to a different location in the organization;
- when the employee's overall accommodations needs or plans are reviewed; and
- when the employer reviews its general emergency response policies.

IASR Section 28: Documented Individual Accommodation Plans

• Requirement:

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 for employees with disabilities.

► How it is being addressed:

RH.HR 1.4 *Employment Equity* covers individual accommodation for employees with disabilities regarding training and advancement.

RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.

RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.

RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability.

It was confirmed that Bruyère's individual accommodation plans meet the following requirements in 2022:

- a) if requested, include any information regarding accessible formats and communications supports provided
- b) if required, include individualized workplace emergency response information; and
- c) identify any other accommodation that is to be provided

✓ Status:

RH.HR 1.4 *Employment Equity* will be revised in 2023.

• Requirement:

The process for the development of documented individual accommodation plans shall include the following elements:

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 information.
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 which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.



Individual accommodation plans shall, (a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26; (b) if required, include individualized workplace emergency response information, as described in section 27; and (c) identify any other accommodation that is to be provided.

- How it is being addressed:
RH.HR 1.4 *Employment Equity* covers individual accommodation for employees with disabilities regarding training and advancement.

RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.

RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.

RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability.

IASR Section 29: Return to Work Process

- Requirement:
Every employer (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 (b) shall document the process.

- How it is being addressed:
Bruyère is committed to the wellness of its employees, supporting an early and safe return to work of those who have suffered from a non-work or work related illness, injury, or disability. Several policies address this commitment:

RH.HR 9.7 *Transitional Return to Work Program: Non-work Related Illness, Injury, or Disability* applies to employees recovering from a non-work related illness, injury, or disability.

RH.HR 9.9 *Work Reintegration, Work Related Illness, Injury or Disability* applies specifically to employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.

RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* applies to employees who are permanently disabled and unable to return to their pre-disability position as a result of a work or non-work related illness, injury, or disability. This policy was revised in 2022.

The Work Reintegration Program takes precedence over the Transitional Work Program policy when the operational requirements demonstrate undue hardship in regard to the efficient functioning of the unit or department.

IASR Section 30: Performance Management

- Requirement:
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 respect of employees with disabilities.
 - How it is being addressed:
Policies RH.HR 7.2 *Performance Management*, HR 1.4 *Employment Equity* and PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities*
- ✓ Status:
RH.HR 7.2 *Performance Management* is due for revision in 2023.
All aspects of the Performance Management portfolio (tools, process and policies) will be revised by the end of 2024. We will ensure that any new documents used for performance management, take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

IASR Section 31: Career Development and Advancement

- Requirement:
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.
 - How it is being addressed:
Policies RH.HR 10.1 *Succession Planning, Leadership* and PHIL 05 *Accessibility Standards for Customer Services for Persons with Disabilities*

Our EFAP (LifeWorks) offers career coaching and career development supplements. The company we use is required to meet the current accessibility standards.
- ✓ Status:
RH.HR 10.1 *Succession Planning, Leadership* will be revised in 2023.

All aspects of the Career Development and Advancement portfolio (tools, process and policies) will be revised by the end of 2023.
Bruyere is rolling out a new HRIS system by the end of 2024, which will integrate some of these functions.
We will ensure that any new documents used for performance management take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

Our electronic learning module is an accessible platform. The learning team will encourage those who need further accommodations to use the platform to contact the learning team, as of the end of 2023.

The documents new hires receive prior to orientation will encourage them to identify their accessibility needs with respect to e-learning as of the end of 2023.

IASR Section 32: Redeployment (January 2014)

- Requirement:
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.
 - How it is being addressed:
Potential redeployment of an employee with a disability or individual accommodation plan includes a review and analysis of the disability and accommodation plan of the employee in relation to the position being considered for redeployment (RH.HR 9.14 *Long Term Accommodation: Work or Non-work Related Illness, Injury or Disability* and individual collective agreements for unionized employees).

IASR Part IV.1: Design of Public Spaces

- Requirement:
Bruyère will continue to establish plans to meet the Accessibility Standards for the Design of Public Spaces when building or redeveloping public spaces.
 - ✓ Status:
Renovations completed at our Geriatric Day Hospital (2018)

Lighting upgrades
- Requirement:
Bruyère will take appropriate measures to prevent service disruptions to its accessible parts of its public spaces. In the event of a service disruption, we will notify the public of the service disruptions and alternatives available.
 - ✓ Status:
Ongoing process already in place

