



**2015-2020**

**Accessibility Plan**

**Bruyère Continuing Care**

**Prepared by**

**Quality, Patient Safety and Risk Management**

**March 2016**

*This publication is available on the hospital's website [www.bruyere.org](http://www.bruyere.org)*

*and on our internal website (Infonet)*

*This plan was inspired by the Ottawa Hospital's Multi-year Accessibility Plan 2013-2017 with gratitude.*

# Bruyère Continuing Care 2015-2020 Accessibility Plan

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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 report.

Among our customers 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 management 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 Continuing Care 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
- Describes how Bruyère makes its accessibility plan available to the public.
- Lists accessibility barriers that Bruyère has addressed in the past five years
- Lists outstanding issues from the previous plan (2009-2010)
- Describes the priorities to remove and prevent barriers to people with disabilities in the next five years

## Description of Bruyère

Bruyère is a dynamic organization that serves the needs of people of all faiths and origins in both official languages. Guided by the mission and values of the Sisters of Charity who came to Ottawa in 1845, Bruyère provides compassionate care through the our three main sites in Ottawa: Elisabeth Bruyère Hospital, Saint-Vincent Hospital, and Résidence St-Louis. Bruyère is also recognized for its teaching and research.

We provide services in the Champlain region through these clinical programs: complex continuing care, long term care, care of the elderly and rehabilitation, palliative care, and family medicine.

## Our Mission

We excel in the provision of evidence based health care and services for the vulnerable and medically complex, with a focus on persons who require sub-acute, geriatric or palliative care.

Inspired by our founder, Mother Élisabeth Bruyère, we are a Catholic health care organization that optimizes the quality of life of people within the diverse community we serve in French and English.

We do this through our commitment to excellence, education, research and innovation, regional partnerships, and bringing care closer to home.

## Our Vision

Enhancing Lives. Transforming Care.

## Our Values

### Respect

- We value consideration and courtesy. We welcome diversity and are respectful of the dignity and autonomy of each person.

### Compassion

- We value a caring and empathetic approach, shaped by the needs and expectations of our patients, residents and their families, as we accompany those in our care through challenging times.

## Collaboration

- We value working together with our patients, residents, their families and our staff to promote a caring and supportive environment. We value all partnerships which further the continuity of care and services according to the needs of our community.

## Accountability

- We value personal, corporate and social responsibility in the delivery of our care and services.

## Learning

- We value and encourage personal development, lifelong learning, evidence-based practice, teaching and research.

## Barrier Identification Methods

The Quality, Patient Safety and Risk Management (QPR) department reports progress on accessibility issues to the Senior Leadership Team. QPR convenes an ad hoc group with appropriate department members to ensure compliance with the AODA and IARS. 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 2015-2020

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. See the table below beginning on page 8. The following links provide associated requirements:

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

<https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf>

A summary of the yearly requirements is listed here:

2012:

- Info/Comm - IARS Section 13: Emergency Procedure, Plans or Public Safety Information (January 2012)

- Employment - IARS Section 27: Workplace Emergency Response Information (January 2012)

2013:

- General - IASR Section 3: Establish written accessibility policies (January 2013)
- General - IASR Section 4: Establish multi-year accessibility plan in consultation with persons with disabilities and staff (January 2013)
- General - IASR Section 5: Incorporate accessibility criteria when procuring goods, services and facilities (January 2013)
- General - IASR Section 6: Ensure Self-Service kiosks are accessible (January 2013)

2014:

- General - IASR Section 7: Provide training on IASR accessibility standards and Human Rights Code for all staff (January 2014)
- Info/Comm - IARS Section 11: Feedback (January 2014)
- Info/Comm - IARS Section 14: Accessible websites and Web Content (January 2014, January 2016, January 2020)
- Employment - IARS Section 22: Recruitment General (January 2014)
- Employment - IARS Section 23: Recruitment, Assessment or Selection Process (January 2014)
- Employment - IARS Section 24: Notice to Success Applicants (January 2014)
- Employment - IARS Section 25: Informing Employees of Support (January 2014)
- Employment - IARS Section 26: Accessible Formats and Communication Supports for Employees (January 2014)
- Employment - IARS Section 28: Documented Individual Accommodation Plans (January 2014)
- Employment - IARS Section 29: Return to Work Process (January 2014)
- Employment - IARS Section 30: Performance Management (January 2014)
- Employment - IARS Section 31: Career Development and Advancement (January 2014)
- Employment - IARS Section 32: Redeployment (January 2014)

2015:

- Info/Comm - IARS Section 12: Accessible Formats and Communication Supports (January 2015)

2016, 2020:

- Info/Comm - IARS Section 14: Accessible websites and Web Content (January 2014, January 2016, January 2020)

### 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 Leadership Team.

### Communication of the Plan

The Accessibility Plan is made available to the public through posting on the Bruyère external website ([www.bruyere.org](http://www.bruyere.org)). Upon request, the document is available in alternative formats such as large print.

Workplan for 2015-2020

Section:	Requirements from - <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	Status
<p><b>IASR Section 3: Establishment of Accessibility Policies</b></p> <p><b>January 2013</b></p>	<ul style="list-style-type: none"> <li>• (1) 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.</li> </ul>	<p>Policy PHIL 05 last revised March 2016</p>
	<ul style="list-style-type: none"> <li>• (2) Include statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner</li> </ul>	<p>Under review</p>
	<ul style="list-style-type: none"> <li>• (3) a) prepare one or more written documents describing its policies; and</li> <li>• b) make the documents publicly available, and shall provide them in an accessible format upon request.</li> </ul>	<p>Policy “Accessibility Standards for Customer Service for Persons with Disabilities” is on both the internal, external websites.</p>
<p><b>IASR Section 4: Accessibility Plans</b></p> <p><b>January 2013</b></p>	<ul style="list-style-type: none"> <li>• (4)(1) a) establish, implement, maintain and document a <b>multi-year accessibility plan</b>, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation;</li> <li>• b) <b>post</b> the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>• c) review and <b>update</b> the accessibility plan at least once <b>every five years</b>.</li> </ul>	<p>a) This document is evidence of compliance.</p> <p>b) Post on internal &amp; external websites Policy PHIL 05 explains that multi-year accessibility plan is accessible upon request.</p> <p>c) Review in 2020</p>
	<ul style="list-style-type: none"> <li>• (4)(2) establish, review and update their accessibility plans <b>in consultation with persons with disabilities</b> and, if they have</li> </ul>	<p>One employee was consulted.</p>



<b>Section:</b>	<b>Requirements from -</b> <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
	<p>established an accessibility advisory committee, they shall consult with the committee.</p> <ul style="list-style-type: none"> <li>• (4)(3) a) prepare an <b>annual status report</b> on the progress of measures taken to implement the strategy referenced in clause (1)(a); and</li> <li>• b) <b>post the status report</b> on their website, if any, and provide the report in an accessible format upon request.</li> </ul>	<p>Annual report posted on external website, with directions for accessing it in an accessible format upon request.</p>
<p><b>IASR Section 5: Procuring or Acquiring Goods, Services, or Facilities</b></p> <p><b>January 2013</b></p>	<ul style="list-style-type: none"> <li>• (5)(1) <b>Incorporate accessibility criteria and features</b> when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.</li> <li>• (5)(2) If it is not practicable to incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, it shall <b>provide, upon request, an explanation.</b></li> </ul>	<p>Terms of Reference for the PE&amp;S Committee were amended to ensure we are meeting accessibility needs for employees with disabilities.</p>
<p><b>IASR Section 7: Training</b></p> <p><b>January 2014</b></p>	<ul style="list-style-type: none"> <li>• (7)(1)ensure that training is provided <b>on the requirements of the accessibility standards</b> referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</li> <li>• (a) all employees, and volunteers;</li> <li>• (b) all persons who participate in developing the organization’s policies; and</li> <li>• (c) all other persons who provide goods, services or</li> </ul>	<p>Policy PHIL 05: outlines training for enhancing accessibility.</p> <p>Online module available for employees starting in May 2012:</p> <ul style="list-style-type: none"> <li>• For employees with visual impairment, narrations of modules are true to the visual content.</li> <li>• Modules on the LMS are accessible at work or at home.</li> </ul>

<b>Section:</b>	<b>Requirements</b> from - <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
	<p>facilities on behalf of the organization.</p>	<ul style="list-style-type: none"> <li>• Module scripts are available for employees with hearing impairments.</li> <li>• Module pages can be enlarged with the zoom.</li> </ul>
	<ul style="list-style-type: none"> <li>• (2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection</li> <li>• (1) shall be appropriate to the duties of the employees, volunteers and other persons.</li> <li>• (3) Every person referred to in subsection (1) shall be trained as soon as practicable.</li> <li>• (4) ..provide training in respect of <b>any changes</b> to the policies described in section 3 on an ongoing basis.</li> <li>• (5) ..<b>keep a record</b> 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.</li> </ul>	<p>(5)The module on accessibility has been completed by 1952 of the 2235 active employees (87.3%, highest completion rate of all modules) Jan/16</p>
<p><b>IARS Section 11: Feedback</b></p> <p><b>January 2014</b></p>	<ul style="list-style-type: none"> <li>• Processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</li> </ul>	<p>Policies ADMIN 02, BRUYERE VILLAGE 04, and PHYSICIAN 02: outline processes responding to complaints and concerns. External website has a Contact Us section and a Comments section with phone numbers and emails for departments and programs.</p>
	<ul style="list-style-type: none"> <li>• Customer Service Standard Feedback Requirement – making feedback processes available to</li> </ul>	<p>External website has a Contact Us section and a Comments section that list telephone</p>

<b>Section:</b>	<b>Requirements</b> from - <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
	<p>the public in person, by telephone, by writing, by email.</p>	<p>numbers and emails for departments and programs. Patient satisfaction surveys are conducted by trained volunteers who give patients the choice to participate and how (method; e.g. with volunteer’s assistance, by themselves, etc.).</p> <p>Family satisfaction surveys are mailed, with paper copies and self-addressed stamped envelope. Cover letter includes a link to complete it online if that is the preferred method. The program director’s telephone number is provided.</p> <p>The patient handbook includes contact information, including to the Office of Patient Experience and the client relations advisor.</p>
	<ul style="list-style-type: none"> <li>• Employee Feedback</li> </ul>	<p>Employees are asked to complete anonymous employee feedback survey every two years, administered by an externally. Various formats are available upon request.</p>
<p><b>IARS Section 12:</b> <b>Accessible Formats and Communication Supports</b> <b>January 2015</b></p>	<ul style="list-style-type: none"> <li>• (1) Upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</li> <li>• in a timely manner that takes into account the person’s accessibility needs due to disability; and</li> <li>• at a cost that is no more than the regular cost charged to other persons.</li> </ul>	<p>ADMIN 02, BRUYERE VILLAGE 04, and PHYSICIAN 02: outline processes for responding to complaints and concerns. The external website has a Contact Us section and a Comments section with telephone numbers and emails for departments and programs.</p>

<b>Section:</b>	<b>Requirements from -</b> <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
	<ul style="list-style-type: none"> <li>(2) Consult with the person making the request in determining the suitability of an accessible format or communication support.</li> </ul>	As above.
	<ul style="list-style-type: none"> <li>(3) Notify the public about the availability of accessible formats and communication supports.</li> </ul>	As above.
<p><b>IARS Section 13:</b> <b>Emergency Procedure, Plans or Public Safety Information</b>  <b>January 2012</b></p>	<ul style="list-style-type: none"> <li>(13)(1) 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.</li> <li>By January 1 2012</li> </ul>	<p>Emergency procedures, plans and information are available on the internal and external websites, and in written format for employees. All are being revised currently (Dec 2015).</p> <p>The communications department coordinated an audit for the external website conducted externally. The content and the platform have been adapted to meet the WCAG 2.0 Level AA standards, with the exception of those excluded by AODA.</p>
<p><b>IARS Section 14:</b> <b>Accessible websites and Web Content</b>  <b>January 2014</b></p>	<ul style="list-style-type: none"> <li>(14)(2) 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.</li> <li>(4) Meet the requirements of this section in accordance with the following schedule:</li> <li>By <b>January 1, 2014</b>, new internet websites and web</li> </ul>	<p>The communications department coordinated an audit for the external website conducted externally. The content and the platform have been adapted to meet the WCAG 2.0 Level AA standards, with the exception of those excluded by AODA.</p> <p>The communications department coordinated an audit for the external website conducted externally. The content and the platform have</p>

<b>Section:</b>	<b>Requirements</b> from - <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
	<p>content on those sites must conform with WCAG 2.0 Level A.</p> <ul style="list-style-type: none"> <li>• By <b>January 1, 2021</b>, all internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> <li>○ success criteria 1.2.4 Captions (Live), and</li> <li>○ success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul> </li> </ul>	<p>been adapted to meet the WCAG 2.0 Level AA standards, with the exception of those excluded by AODA.</p>

### PART 3: HUMAN RESOURCES:

<b>Barrier/Requirement</b>	<b>Requirements</b> from - <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
<p><b>IARS Section 22: Recruitment General</b></p> <p><b>January 2014</b></p>	<ul style="list-style-type: none"> <li>• (22) Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</li> </ul>	<p>Policy RH.HR 1.1 and RH.HR 1.2: Outline steps to ensure non-discrimination in hiring process.</p> <p>Policy PHIL 05: outlines accessibility policies and procedures.</p> <p><i>Sentence “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)</i></p>
<p><b>IARS Section 23: Recruitment,</b></p>	<ul style="list-style-type: none"> <li>• (23)(1) During a recruitment process, an employer shall notify job applicants, when they are</li> </ul>	<p>Policy RH.HR 1.1 and RH.HR 1.2: Outline steps to ensure non-discrimination in hiring process.</p>

<b>Barrier/Requirement</b>	<b>Requirements</b> from - <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
<b>Assessment or Selection Process</b>  <b>January 2014</b>	<p>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.</p> <ul style="list-style-type: none"> <li>(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.</li> </ul>	<p>Policy PHIL 05: outlines accessibility policies and procedures.</p> <p>Sentence <i>"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."</i> is on all job postings (internal and external)</p> <p>As above.</p>
<b>IARS Section 24: Notice to Success Applicants</b>  <b>January 2014</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Policy RH.HR 1.1 and RH.HR 1.2: Outline steps to ensure non-discrimination in hiring process.</p> <p>Policy PHIL 05: outlines accessibility policies and procedures.</p> <p>Written offers of employment make reference to all Bruyère policies, including those noted above.</p>
<b>IARS Section 25: Informing Employees of Support</b>	<ul style="list-style-type: none"> <li>Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited</li> </ul>	<p>Policy RH.HR 1.1 and RH.HR 1.2: Outline steps to ensure non-discrimination in hiring process.</p>

<b>Barrier/Requirement</b>	<b>Requirements from -</b> <a href="https://www.tiaontario.ca/uploads/IARS%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IARS%20Policy%20Guidelines.pdf</a>	<b>Status</b>
<b>January 2014</b>	to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.	Policy PHIL 05: outlines accessibility policies and procedures.  Written offers of employment make reference to all Bruyère policies, including those noted above.
	<ul style="list-style-type: none"> <li>Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</li> </ul>	As above.  All new employees attend corporate orientation which includes the provision of information regarding the employers’ policies and where they can be accessed.
	<ul style="list-style-type: none"> <li>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.</li> </ul>	As above. Bulletins regarding new and revised policies are posted on the employers’ internal web site.
<b>IARS Section 26: Accessible Formats and Communication Supports for Employees</b>  <b>January 2014</b>	<ul style="list-style-type: none"> <li>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. O. Reg. 191/11, s. 26 (1).</li> </ul>	Policy PHIL 05: outlines accessibility policies and procedures.
	<ul style="list-style-type: none"> <li>The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</li> </ul>	As above.

<b>Barrier/Requirement</b>	<b>Requirements from -</b> <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
<b>IARS Section 27: Workplace Emergency Response Information</b>  <b>January 2012</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<p>Emergency procedures, plans and information are available on the internal website, and in written format for employees. All are being revised currently (Dec 2015). Emergency Preparedness plans includes sections for staff with disabilities.</p> <p>As above.</p> <p>As above.</p> <p>As above.</p>
<b>IARS Section 28: Documented Individual Accommodation Plans</b>	<ul style="list-style-type: none"> <li>• Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual</li> </ul>	<p>RH.HR 1.4: Employment Equity covers individual accommodation for employees with disabilities regarding training and advancement.</p>



<b>Barrier/Requirement</b>	<b>Requirements from -</b> <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
<b>January 2014</b>	accommodation plans for employees with disabilities.	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.
	<ul style="list-style-type: none"> <li>• The process for the development of documented individual accommodation plans shall include the following elements:               <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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.</li> <li>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.</li> </ol> </li> </ul>	As above.

<b>Barrier/Requirement</b>	<b>Requirements from -</b> <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
	<ol style="list-style-type: none"> <li>5. The steps taken to protect the privacy of the employee's personal information. ✓</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. <ul style="list-style-type: none"> <li>• 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.</li> </ul> </li> </ol>	
<p><b>IARS Section 29: Return to Work Process</b></p> <p><b>January 2014</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work</li> </ul>	<p>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.</p> <p>RH.HR 9.9 Work Reintegration, Work Related Illness, Injury or Disability applies specifically to</p>

<b>Barrier/Requirement</b>	<b>Requirements</b> from - <a href="https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf">https://www.tiaontario.ca/uploads/IASR%20Policy%20Guidelines.pdf</a>	<b>Status</b>
	<p>of employees who were absent because their disability required them to be away from work; and (b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <ul style="list-style-type: none"> <li>• The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</li> </ul>	<p>employees who have, in the course of or arising from their employment, sustained a work related illness, injury, or disability.</p> <p>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.</p>
<p><b>IARS Section 30: Performance Management</b> <b>January 2014</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>Policies RH.HR 7.2 Performance Management , HR 1.4 Employment Equity and PHIL 05 Accessibility Standards for Customer Services for Persons with Disabilities</p>
<p><b>IARS Section 31: Career Development and Advancement</b> <b>January 2014</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>Policies RH.HR 10.1 Succession Planning, Leadership and PHIL 05 Accessibility Standards for Customer Services for Persons with Disabilities.</p>
<p><b>IARS Section 32: Redeployment</b> <b>January 2014</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>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</p>

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	<ul style="list-style-type: none"> <li>• Redeployment means the 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.</li> </ul>	to the position being considered for redeployment.