



NURSING & HOMEMAKERS INC.

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NURSING & HOMEMAKERS INC. Multi-Year Accessibility Plan (2017-2025) Revised March 2024



TABLE OF CONTENTS

1.	INTRODUCTION.....	3
2.	NURSING & HOMEMAKERS INC. STATEMENT OF COMMITMENT	3
3.	SCOPE.....	3
4.	PLAN PURPOSE & OVERVIEW	3
5.	PROCEDURES	4
5.1.	General Requirements	4
5.2.	Customer Service Standard	4
5.3.	Integrated Accessibility Standards	4
6.	ACTION PLAN SCHEDULE	5
6.1.	As of January 1, 2012	5
6.2.	As of January 1, 2014	5
6.3.	As of January 1, 2015	6
6.4.	As of January 1, 2016	6
6.5.	As of January 1, 2017	6
6.6.	As of January 1, 2020	6
6.7.	As of January 1, 2021	6
6.8.	As of January 1, 2023	6
6.9.	As of January 1, 2025	6
7.	DEFINITIONS	7
8.	REFERENCES.....	7
9.	MULTI-YEAR ACCESSIBILITY PLAN	8

1. INTRODUCTION

The Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) aims to create a fully accessible province, where individuals with disabilities are treated with respect and dignity, and have equal access to goods and services. The established deadline for accessibility for all Ontarians is 2025.

The AODA outlines the guidelines and timelines that all businesses and organizations in Ontario must follow to identify, remove and prevent barriers to accessibility as a means to achieving accessibility with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. As a Healthcare Agency whose mission is to provide innovative, safe, client-focused and culturally sensitive care to its client population, Nursing & Homemakers Inc. (NHI) is dedicated to meeting the Accessibility and Accommodation requirements as stated in the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”). In alignment with the AODA, our Multi-year Accessibility plan includes guidelines and timelines to identify, remove and prevent barriers to accessibility, as a means to achieving accessibility with respect to Customer Service, Information and Communications, Employment and Design of Public Spaces.

2. NURSING & HOMEMAKERS INC. STATEMENT OF COMMITMENT

Nursing & Homemakers Inc., believes in treating all people in a way that allows them to maintain their dignity and independence, and provides for the integration of equal opportunity. We support the full inclusion of persons with disabilities as set out in both the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA). This policy outlines NHI's commitment to meeting the needs of people with disabilities in a timely manner, the prevention and removal of barriers to accessibility in accordance with relevant legislation, and meeting all accessibility requirements under the (AODA) and its standards.

3. SCOPE

This policy applies to all NHI’s clients, employees, contractors, agents, volunteers, vendors, and any third-party relationships associated with NHI. It encompasses all of NHI’s facilities and services.

4. PLAN PURPOSE & OVERVIEW

This multi-year Accessibility Plan outlines NHI’s strategy to prevent and remove barriers that may hinder individuals accessing our service, and improve opportunities for people with disabilities.

In working towards its goals to provide a barrier free environment to persons with disabilities, NHI will act conscientiously in keeping with its own policies and other relevant legislation.

In accordance with the requirements set out in the Integrated Accessibility Standard, NHI will:

- Establish, review and update this plan in consultation with persons with disabilities
- Post this plan on its website www.nhihealthcare.com
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five (5) years

NHI recognizes that much of the service we provide is actually delivered in individual client's homes. We are committed to honoring the spirit and intent of this policy in all situations.

The tables on the following pages set out the specific deliverables that NHI has identified in its Accessibility Plan along with key dates. NHI has reached compliance for the applicable standards required to date.

5. PROCEDURES

5.1. General Requirements

General requirements; NHI will ensure the following:

- Equal access and participation for people with disabilities
- Information is communicated in accessible formats
- Compliance with the Customer Service Standard and ensure Integrated Accessibility Standard
- That its premises are barrier-free
- Staff are aware of available accommodations (upon request)
- Training on accessibility and related legislation are provided as needed
- A multi-year accessibility plan is established, maintained and updated as required
- Processes for receiving and responding to feedback are maintained and available in accessible formats upon request

5.2. Customer Service Standard

In carrying out its functions and responsibilities, NHI will:

- Communicate in a manner appropriate to the individual's disability
- train its staff on how to communicate effectively with people with disabilities
- Provide telephone services that offer alternative communication methods
- Provide invoices in accessible forms
- Welcome Support Persons and Service Animals
- Promptly post Notices of temporary disruptions
- Provide training to its staff on accessibility
- Ensure feedback processes are accessible and responsive

5.3. Integrated Accessibility Standards

- Accessibility criteria will be considered when securing goods, services, or facilities
- Information and communications will be provided in accessible formats
- Emergency information will be available in accessible formats
- Website accessibility will conform to WCAG 2.0
- Employment standards will ensure accessibility throughout the employment cycle
- Accommodations will be provided during recruitment, hiring, and employment
- Individual Accommodation Plans (IAP) will be developed for employees with disabilities
- Return to work processes will accommodate employees with disabilities
- Performance management will consider accommodation needs

- Workplace emergency response information will be provided upon request
- Public spaces will incorporate accessibility standards

6. ACTION PLAN SCHEDULE

6.1. As of January 1, 2012

- Ensuring all persons who, on behalf of NHI, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities
- Ensuring staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing NHI's goods or services
- Ensuring completion of accessibility training is tracked and recorded
- Ensuring customers accompanied by a guide dog or other service animal in areas of NHI open to the public and other third parties, are accommodated
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated
- Issuing a public notice in a timely manner in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities. The notice must include the reason of the disruption, the anticipated duration, and a description of alternative facilities or service, if any, that may be available
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication methods
- Reporting compliance with the customer service standard on the Accessibility Compliance Reporting tool at Service Ontario's One-Source for Business

Report compliance by December 31, 2012

Status: Completed

6.2. As of January 1, 2014

- Accessibility policies are in place to help the organization achieve accessibility goals; inform employees and customers about the policies
- Have a multi-year accessibility plan that outlines what the organization will be doing to meet our accessibility requirements now, and in the future, and put it on the company's website
- Consider accessibility when purchasing or designing self-service kiosks
- Update old website and ensure new website and web content are accessible

File compliance report by December 31, 2014

Status: Completed

6.3. As of January 1, 2015

- Train staff on Ontario's Accessibility laws
- Ensure surveys, comment cards or other feedback processes are available in accessible formats upon request

Status: Completed

6.4. As of January 1, 2016

- Make the company's public information accessible upon request
- Make NHI's employment practices, such as how we hire, retain and provide career development opportunities more accessible to all our employees

Status: Completed

6.5. As of January 1, 2017

Make new or redevelop public spaces listed below to be accessible

- Staff eating areas i.e., lunch room, kitchenette with fridge & microwave
- Exterior paths of travel, e.g., sidewalks and curb ramps
- Parking lots
- Service counters, fixed queuing guides and waiting areas with fixed seating
- Maintain the accessible elements of public spaces

File an accessibility compliance report by December 31, 2017

Status: Completed

6.6. As of January 1, 2020

File an accessibility compliance report by December 31, 2020

Status: Completed

6.7. As of January 1, 2021

Make all website and web content accessible

Status: Completed

6.8. As of January 1, 2023

File an accessibility compliance report by December 31, 2023

Status: Completed

6.9. As of January 1, 2025

Ontario will be an accessible province

7. DEFINITIONS

- a) **Accessible Formats:** Include but are not limited to large print, recorded audio, electronic formats, braille, and other formats usable by persons with disabilities
- b) **Accommodation:** Refers to special arrangements or assistance provided to enable persons with disabilities to participate in experiences available to others without disabilities, tailored to individual needs
- c) **Assistive Devices:** Supporting aids such as communication aids, cognition aids, personal mobility aids, and medical aids
- d) **Communication Supports:** Devices or tools aiding communication between individuals, including captioning, plain language, sign language, etc.
- e) **Disability:** Encompasses physical, mental, developmental, learning disabilities, mental disorders, and injuries, including both visible and non-visible disabilities
- f) **IASR:** Integrated Accessibility Standards Regulation
- g) **Support Persons:** Individuals who accompany persons with disabilities to provide assistance
- h) **Service Animals:** Animals trained to perform tasks or work for the benefit of persons with disabilities
- i) **Unconvertible:** Information or communication that cannot be converted due to technical limitations

Questions: For inquiries regarding this policy, please contact NHI's President and/or General Counsel.

Additional Resources: Related policies: [List of related policies]

This policy shall be reviewed periodically to ensure its effectiveness and compliance with relevant legislation and standards.

8. REFERENCES

- a) Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Retrieved from: <http://www.mcsc.gov.on.ca/documents/en/mcss/publications/accessibility/AboutAODAWeb20080311EN.pdf>
- b) Ontario Regulation 429/07. Retrieved from: <https://www.ontario.ca/laws/regulation/070429>
- c) Accessibility for Ontarians with Disabilities Act, 2005; Service Ontario e-laws; Retrieved from: http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm



MULTI-YEAR ACCESSIBILITY PLAN
Nursing & Homemakers Inc. (NHI)

PART I – GENERAL REQUIREMENTS				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Accessibility Policies				
Develop, implement, and maintain policies re: accessibility in compliance with Integrated Accessibility Standards Regulations (IASR) and the Ontario Human Rights Code regulation.	January 1, 2014	<p>Policies developed, implemented and electronically posted and available in accessible format on request.</p> <p><u>Accessibility Policies include:</u></p> <ul style="list-style-type: none">• Accessible Customer Service• Accessible Employment• Disability Accommodation <p><u>Additional Policies Addressing Accessibility:</u></p> <ul style="list-style-type: none">• Fire & Evacuation• Procurement Recruitment & Selection• Return to Work• Visitor Policy	Completed and on-going	<p>Review of accessibility policies annually as part of status review.</p> <p>Routinely review website and intranet links.</p>
Include statement of commitment.	January 1, 2014	NHI’s Commitment Statement is included in both Accessible Customer Service and Accessible Employment policies and the Multi-year Plan posted on the website and intranet.	Completed	
Written documents, publicly available in accessible format.	January 1, 2014	<p>NHI’s Website includes Accessibility Page containing:</p> <ul style="list-style-type: none">• Accessible Customer Service and Accessible Employment Policies• Links to the Multi-Year Plan and Status Report. <p>Accessible formats available on request.</p>	Completed and on-going	<p>A . Post new form to facilitate requests for accessible format and communication support.</p> <p>B . Routinely review website and intranet links.</p>

PART I – GENERAL REQUIREMENTS				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Accessibility Plans				
<p>A. Develop, implement, maintain, document multi-year accessibility plan which outlines strategies to prevent and remove barriers.</p> <p>B. Post on website. Review and update every five years.</p> <p>C. Review and update plans in consultation with persons with disabilities.</p> <p>D. Post Annual Status Report on Website.</p>	January 1, 2014	<p>A. 2017-2021 Accessibility Plan is currently posted and available in accessible format on request.</p> <p>B. 2014-2018 Accessibility Plan initially posted.</p> <p>C. Plans were developed and reviewed in consultation with cross functional Advisory Group (representing Facilities, Communications, Occupational Health & Safety, Human Resources, Home & Community Care, Quality, Risk & Patient Safety, Information Technology) and persons with disabilities.</p> <p>D. 2019 Annual Status Report posted and available in accessible format on request.</p>	Completed and on-going	<p>A. 2019 Annual Status Report posted and available in accessible format on request.</p> <p>B. Continue to review plan at least once every 5 years. Post status report annually.</p> <p>C. Extend representation on Advisory Group to a participant of the Patient and Family Advisory Committee (non-employee).</p>
Procurement				
Incorporate accessibility design, criteria, features when procuring/acquiring goods, services, facilities.		Where practicable, accessibility criteria have been incorporated when procuring or acquiring goods, services and facilities.	Completed and on-going	
Training				
Ensure relevant training re: Accessibility Standards for all Ontarians and Ontario Human Rights Code are provided to employees, volunteers, persons involved in policy development, persons who provide goods, services, or facilities on behalf of the organization.	January 1, 2015	<p>NHI is committed to implementing a process to ensure all employees, volunteers, and all other persons who provide goods, services and facilities on NHI's behalf, and persons participating in the development and approval of NHI's policies, are provided with appropriate training on the requirements of the IASR, and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.</p> <ul style="list-style-type: none"> Training is developed and delivered in various formats, based on the learning needs of the 	Completed and on-going	<p>Ongoing review of training to reflect changes in legislation, our policy and multi-year accessibility plan.</p> <p>Training will be provided on any changes to our policy and the Legislative standard</p>

PART I – GENERAL REQUIREMENTS

Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
		individual(s) <ul style="list-style-type: none"> • Training introduces the new accessibility module incorporating IASR, Accessible Customer Service, Human Rights and Communication Tools • Training is mandatory for all employees, and is available to all staff as a refresher through written transcript, or on the learning management system. • Accessibility policies are introduced at orientation. • Additional role specific training is available for some occupations. A. Contractual provisions support training at service provider organizations.		
Ongoing training re: policy changes.	January 1, 2015	Ongoing training occurs as required. Method of training/education is dependent on the nature of the change, the accessibility needs requirement, and may include team meetings, bulletins, or self-directed training modules.	On-going	Explore opportunities to promote IASR, policies and support tools through additional avenues to reinforce training on an annual basis.
Keep record of training provided.	January 1, 2015	A. NHI keeps and maintains a record of the training provided. B. The record of training includes <ul style="list-style-type: none"> • name of participants • date and time the training was taken • number of individuals who received the training C. Historic records additionally available in the HR system D. Surveys and feedback processes are accessible upon request	Completed and on-going	

PART I – GENERAL REQUIREMENTS

Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Continue to train new staff as part of the new hire onboarding	January 1, 2016 – January 1, 2021	<p>A. Make employment practices, such as how NHI hires, retains, and provides career development opportunities more accessible</p> <p>B. Training occurs as required</p> <p>C. Method of training/education is dependent on the nature of change, and may include team meetings, bulletins, or Zoom meetings.</p>	Completed and on-going	Ongoing and review as needed
Continue to train new staff and update current staff on AODA to facilitate compliance	January 1, 2023	<p>A. AODA standards are included in NHI’s staff onboarding</p> <p>B. NHI provides refresher and update to current staff re: AODA</p> <p>C. NHI continues to ensure record keeping that includes the name of participants, date and time the training was done (for new and current employees), and the number of attendees</p> <p>D. The organization works with HR to ensure Information on AODA is included in the New Hire Orientation Package.</p> <p>Training is provided to:</p> <ul style="list-style-type: none"> • Staff and volunteers • Individuals involved in developing accessibility policies • Individuals providing goods, services, or facilities on behalf of the organization <p>Training for all employees include:</p> <ul style="list-style-type: none"> • Training about providing goods, services or facilities to persons with disabilities • A review of the purposes of AODA • A review of the purposes of the Customer Service Standards 	Completed and on-going	Ongoing update as new changes to the AODA comes into effect

PART I – GENERAL REQUIREMENTS				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
	January 1, 2023	<ul style="list-style-type: none"> How to interact and communicate with persons with various types of disabilities How to interact with persons with disabilities who use an assistive device, or require the assistance of a guide dog or other service animal, or the assistance of a support person How to use equipment or devices available on NHI’s premises or otherwise provided by NHI, to help provide goods, services or facilities to a person with a disability What to do if a person with a particular disability is having difficulty accessing NHI’s goods, services and facilities. <p>E. File an accessibility compliance report online by December 31, 2023</p>	<p>Completed and on-going</p> <p>Completed</p>	
<p>Ontario is Accessible</p> <p>Continue to train new staff and update current staff on AODA to ensure compliance</p>	January 1, 2025	<p>NHI will:</p> <p>A. Continue with training as outlined above, along with any new updates and changes as per AODA</p> <p>B. NHI will be compliant with the accessibility standards as outlined in the AODA</p> <p>C. NHI will file an accessibility compliance report by December 31, 2026</p>	Completed and on-going	

PART II: IASR - INFORMATION & COMMUNICATION STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Feedback				
Feedback Mechanisms Must Be Accessible to Persons with Disabilities – By Providing Accessible Formats and Communications Supports. Notify Public.	January 1, 2015	<p>NHI is committed to complying with the provisions of the AODA, in respect of this requirement, with the objective of making applicable company information and communications accessible to persons with disabilities.</p> <p>A. Website invites feedback and provides options to give feedback by telephone, TTY, in person, and in writing.</p> <p>B. Accessible Customer Service policy specifies alternate means of communication supports for feedback.</p> <p>C. Ensure that feedback processes are accessible to persons with disabilities, by providing or arranging for the provision of accessible formats and communications supports, upon request.</p>	Completed and on-going	
Accessible Formats and Communications Support				
<p>A. Provide accessible formats and communications supports upon request (timely, same cost, in consultation)</p> <p>B. Consult with person making request re: suitability of format. Notify public re: above.</p>	January 1, 2016	<p>In accordance with the IASR:</p> <p>A. Accessible formats shall be provided or arranged to be provided in a timely manner taking into account the person’s disability and at no additional cost to the individual.</p> <p>B. Develop clear communication methods to inform clients about policies regarding service animals and support persons, i.e.,</p> <ul style="list-style-type: none"> Post information visibly on premises Update NHI’s website Distributed printed materials 	Completed and on-going	Post new form to facilitate requests for accessible format and communication support.

PART II: IASR - INFORMATION & COMMUNICATION STANDARD

Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Increase to WCAG 2.0	January 1, 2021	<p>C. Consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>D. Notify the public about the availability of accessible formats and communication supports</p> <p>Key documents and accessibility training materials are prepared in a conversion-ready format, taking into account the AODA and the changing needs of individuals with disabilities</p>	In progress	Accessible formats and Communication Support-related
Increase to WCAG 2.0	January 1, 2023	<p>Key documents and accessibility training materials are prepared in a conversion-ready format</p> <ul style="list-style-type: none">• Information and functionality review• Increase to WCAG 2.0	In progress	Procurement with internet and intranet provider for site update Work with new template for site update and overhaul as Update as required
Level AA by 2025	January 1, 2025	<p>Key documents and accessibility training materials are prepared in a conversion-ready format</p> <ul style="list-style-type: none">• Information and functionality review• Increase to WCAG 2.0 <p>NHI is compliant: Website is upgraded to Level AA</p>	Completed and ongoing	Continuous upgrading as required

PART II: IASR - INFORMATION & COMMUNICATION STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Emergency Procedure, Plans, Public Safety Information				
If the organization prepares emergency procedures, plans, and public safety information, the material is made available to the public in accessible formats on request.	January 1, 2012 – January 1, 2025	<p>NHI is committed to complying with the provisions of AODA in respect of this requirement, with the objective of making our company’s premises safer for persons with disabilities during emergency circumstances</p> <p>A. Emergency procedures, plans, and public safety information that are prepared by NHI and made available to the public, will be made available in accessible format or with appropriate communication supports as soon as practicable, upon request.</p> <p>B. The Fire and Evacuation Policy is available in accessible format on request.</p> <p>C. In the event of an emergency, NHI’s management team shall enact their Emergency Response Plan. The plan will incorporate communicating and assisting staff and visitors with self-disclosed accessibility challenges</p> <p>D. Facilities and devices used to provide service to accessible customers, shall be maintain in a manner that keeps the facilities and devices available for use without impediment. Examples are floors free of clutter or door closures working properly.</p>	Completed and on-going	Ongoing review, update and assessment
		<p>E. In case of a temporary disruption affecting services for people with disabilities, NHI shall notify clients:</p> <ul style="list-style-type: none"> • about the temporary disruption • reason for the disruption • anticipated duration • alternative services available 	Completed and on-going	

PART II: IASR - INFORMATION & COMMUNICATION STANDARD

[illegible]

PART II: IASR - INFORMATION & COMMUNICATION STANDARD

Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
		<ul style="list-style-type: none">• There are changes in the employee’s needs• The employee is transferred or moves to a different location in the organization• The employee’s overall accommodation needs or plans are reviewed; and or• NHI reviews its general emergency response policies <p>H. Fire and evacuation policy outlines the processes for sharing information with the individual designated to provide assistance.</p>		
Accessible Websites and Web Content				
Conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) initially at Level A and increasing to AA. Applies to websites/content including web-based applications, that an organization control directly or through a contractual relationship that allows for modification of the product and web content published after 2012.	January 1, 2014	In accordance with the IASR, NHI will ensure that NHI’s public websites and online content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A (new websites and online content) by January 1, 2014, to Level AA for all content by January 1, 2021	2014-Completed and on-going	Develop plan to achieve the 2021 compliance
		WCAG 2.0 Level A – new Internet website and web content in place	Level A – Completed and acknowledged	
	January 1, 2021	WCAG 2.0 Level AA – all Internet website and web content, except for exclusions set out in the IASR.	Level AA – In process.	
		Website updated in compliance with WCAG 2.0 Continuous and		
	January 1, 2025	Website conforms to the WCAG 2.0 Level AA		

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Recruitment, General				
Notify employees and public about the availability of accommodation for applicants with disabilities.	January 1, 2016 – January 1, 2021	<p>NHI is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making the recruitment process accessible to persons with disabilities.</p> <p>In accordance with IASR, NHI will do the following:</p> <ul style="list-style-type: none"> A . All external job postings contain notice that accommodations are available during the recruitment/selection process on request to Human Resources. B . Notice also identified in the Accessible Employment Policy posted on the website. C . Accommodation shall be provided in accordance with the Ontario Human Rights Code and AODA. 	Completed and on-going	Ongoing review of information as needed
	January 1, 2021 – January 1, 2023	<p>The above practices are maintained and when necessary, updates are made in compliance with AODA</p> <p>File compliance report by December 31, 2023</p>	<p>Completed and on-going</p> <p>Completed</p>	Ongoing review of information as needed
	January 1, 2025	<p>Ontario is accessible</p> <p>Ongoing review and assessment</p> <p>File compliance report by December 31, 2025</p>	Completed and acknowledged	Ongoing review of information as needed

PART III: IASR - EMPLOYMENT STANDARD

Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Recruitment, Assessment or Selection Process				
Advise applicants invited to participate in assessment process that accommodation is available.	January 1, 2016 – January 2021	<p>NHI will 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 in the assessment/selection process. This will include:</p> <ul style="list-style-type: none"> A . A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates B . Notification statement included on the application form and external career site. Interview candidates are provided the opportunity to request an accommodation during interview confirmation process. C . Training provided to interview coordinators addresses accommodation needs during the assessment process if requested. D . If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability. 	Completed and on-going	
Upon request, consult with applicant re: suitable accommodation.	January 1, 2016 – January 2021	Human Resources will consult with the person with disability regarding accommodation needs and coordinate with the interviewing manager to establish an appropriate strategy to address accommodation needs.	Completed and on-going	

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Notice To Successful Applicants				
Notify successful applicants of policies for accommodating.	January 1, 2016 –	<p>When making offers of employment, NHI will notify the successful applicant of its policies for accommodating employees with disabilities.</p> <p>Awareness is incorporated in to the on-boarding process through the offer letter, orientation presentation, and mandatory training on policies, standards and communication tools.</p>	Completed and on-going	Review and update as necessary
	January 2021 – January 1, 2023	<p>NHI will: Continue to review policies as necessary, and make modification of existing recruitment policies, procedures, processes and templates</p> <p>NHI’s policies on accommodating employees with disabilities is included in the offer of employment letters.</p>	Completed and on-going	Continue to review and update as necessary
	January 1, 2025	<p>NHI will: Continue to review policies as necessary, and make modification of existing recruitment policies, procedures, processes and templates</p> <p>NHI’s policies on accommodating employees with disabilities is included in the offer of employment letters.</p> <p>NHI is compliant with the Accessibility ACT</p>	Completed and on-going	Ongoing review and update as new policies/changes come into effect

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Informing Employees of Supports				
Inform employees of policies to support employees with disabilities, including policies on job accommodation as soon as practicable after hire. Policy changes and updates to be provided on on-going basis.	January 1, 2016	<p>NHI is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of informing employees of available accessibility supports.</p> <p>In accordance with IASR, NHI will:</p> <p>A. 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.</p> <p>B. Provide the information required to new employees as soon as practicable after they begin their employment</p> <p>C. 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</p> <p>D. Where an employee with a disability requests it, consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:</p> <ul style="list-style-type: none"> Information that is needed in order to perform the employee’s job; and Information that is generally available to employees in the workplace. <p>E. NHI will consult with the employee making the request in determining the suitability of an accessible format or communication support</p> <p>F. The Human Resources Presentation on day one</p>	Completed and on-going	Review and update for 2025

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
	January 1, 2021 – January 1, 2025	<p>of corporate orientation provides an overview of the policies.</p> <p>G . Employees will be notified and educated on significant changes to the accessibility policies.</p> <p>H . Accessibility training is mandatory for all staff. The eLearning module is assigned during corporate orientation for new hires.</p> <p>NHI will continue to support employees as stated above and make necessary changes to maintain compliance with AODA</p> <p>NHI will maintain all regulatory standards for supporting employees with disability</p>	Completed and on-going	
Accessible Formats for Employees				
Upon request, provide accessible formats and communications support re: information required to perform job, information generally available in workplace. Consult with employee.	<p>January 1, 2016</p> <p>January 1, 2021 - January 1, 2023</p> <p>December 31, 2023</p>	<p>NHI will remain consistent in:</p> <p>Asking new staff to identify required supports/accessible formats on New Hire Package submitted to Human Resources. A <i>Request for Accessible Format or Communication Support Form</i> is also available for completion. On request, consultation with the employee will occur.</p> <p>NHI will continue practices as stated above, to ensure accessibility for all staff with disabilities.</p> <p>NHI will file Accessibility compliance report</p>	<p>Completed and on-going</p> <p>Completed and ongoing</p> <p>Completed</p>	Review and update for January 1, 2025

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
	January 1, 2025	NHI will continue practices as stated above, to ensure accessibility for all staff with disabilities NHI will be compliant with Accessibility Act	Completed and ongoing	
Documented Individual Accommodation Plans				
Written process for development of documented individual accommodation plans. Process to include specific elements listed. [employee participation, accessible format, individual assessment, employer to cover cost of medical evaluation.	January 1, 2014	Disability Accommodation and Return to Work policies identify process, procedure and requirements for individual accommodation plans which will be documented in the employee's file.	Completed and on-going	
Return To Work Process				
Have in place a documented return to work process that makes use of documented individual accommodation plans.	January 1, 2016 – January 1, 2025	<p>NHI is committed to complying with the provisions of the AODA, with the objective of improving accommodation and return to work processes in the workplace.</p> <p>A Return-to-Work policy and procedure is in place to guide the development of individual accommodation needs based on abilities and limitations of the employee.</p> <p>NHI's existing policies will be reviewed to include processes that NHI will follow to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.</p> <p>NHI will review and assess the existing policies to ensure that they include a process for the</p>	Completed and on-going	

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
		<p>development of documented individual accommodation plans for employees with a disability, if such a plan is required.</p> <p>NHI will ensure that the process for the development of documented individual accommodation plans includes the following elements:</p> <ul style="list-style-type: none"> • The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. • The means by which the employee is assessed on an individual basis. • The manner in which NHI can request an evaluation by an outside medical or other expert, at NHI's expense, to assist NHI in determining if accommodation can be achieved and, if so, how accommodation can be achieved. • 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. • The steps taken to protect the privacy of the employee's personal information. • The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 		

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
		<ul style="list-style-type: none"> If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. <p>Individual accommodation plans will:</p> <ul style="list-style-type: none"> If requested, include any information regarding accessible formats and communications supports provided, as required in the Standard; If required, include individualized workplace emergency response information, as required in the Standard; and Identify any other accommodation that is to be provided. <p>NHI will ensure that the return-to-work process as set out in its existing policies outlines the steps NHI will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return-to-work process.</p>		
Performance Management				
Must take into account the accessibility needs and individual accommodation plans of employees.	January 1, 2016	NHI will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:	Completed and on-going	

PART III: IASR - EMPLOYMENT STANDARD

Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
		<p>When using its performance management process in respect of employees with disabilities</p> <p>Progressive discipline, performance improvement plans and professional development activities will take into account the needs of employees with identified disabilities.</p>		
Career Development and Advancement				
Must take into account the accessibility needs and individual accommodation plans of employees.	January 1, 2016 – January 2025	<p>NHI will take into account Individual accommodation needs when:</p> <p>A. Employees are considered for positions internally.</p> <p>B. When providing career development and advancement to its employees with disabilities;</p> <p>Internal application questionnaires will ask candidates if accommodation is required during the selection process.</p> <p>When employees with an accommodation plan are successful for job postings, Human Resources will send notification to Leadership Team to review and communicate appropriately.</p>	Completed and on-going	
Redeployment				
Must take into account the accessibility needs and individual accommodation plans of employees.	January 1, 2016 – January 1, 2021	<p>NHI will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when deploying employees.</p> <p>NHI will continue to assess employees with</p>	Completed and on-going	

PART III: IASR - EMPLOYMENT STANDARD				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
	January 2021 – January 2023	disabilities, and take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when deploying employees.	Completed and on-going	
	January 1, 2025	NHI is Accessible and compliant with AODA	Completed and on-going	

PART IV.1 DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT)				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Exterior Paths of Travel and Obtaining Services				
A. Make exterior paths of travel accessible. B. Make parking accessible. C. Make service counters, queuing guides and waiting areas accessible. D. Maintain the accessible parts of your public spaces.	January 1, 2017 – January 1, 2025	Accessibility standards were considered in the recent redesign of the office space. Service Counters have been designed at accessible heights, and waiting areas are accessible. Eating area is accessible Washroom is accessible	Completed and on- going	Incorporate related criteria on the Office Inspection Checklists for the Joint Health and Safety Committee.

PART IV.1 DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT)				
Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
Policies				
<p>A. Develop, implement and maintain policies regarding goods, services, facilities in a manner that respects dignity and independence, is integrated, and provides equal opportunity.</p> <p>B. Policies to address use of Assistive Devices, Service Animals and Support persons. Notice to be provided in conspicuous places.</p>	January 1, 2012	Accessible Customer Service Policy is in place and details posted on the website and internal intranet site.	Completed and on-going	On-site signage and visitor logs will be reviewed for enhanced communication options.
<p>c. Provide notice of temporary disruptions in goods, services, facilities, including reasons for disruption, duration, alternatives available.</p>	January 1, 2012	Process identified in the Accessible Customer Service Policy. Subject to this requirement may include such things as accessible parking, washrooms, elevators or power doors to public entrances.	Completed and on-going	
<p>D. Provide training to employees, volunteers, policy developers, others providing goods, services and facilities. Training to include purposes of the Act, instruction regarding how to interact/communicate with various types of disabilities, assistive devices/support animals, how to use support tools.</p>	January 1, 2012	<p>A. Training is provided and is available to all employees.</p> <p>B. Training module includes how to interact and communicate with various types of disabilities, assistive devices, support animals and how to use support tools.</p>	Completed and on- going	

PART IV.1 DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT)

Requirement/Standard	Deadline	Action Taken	Status	Continuous Improvement Actions/Next Steps
E. Establish and document process for receiving and responding to customer (and employee) feedback. Prepare document describing feedback process to provide to persons providing feedback and make available in conspicuous spaces.	January 1, 2012	NHI website and Accessible Customer Service policy address the feedback process (which can be provided by phone, TTY, email, face to face or other format/communication support necessary and available).	Completed and on-going	
F. On request, documents will be provided to a person with a disability in an accessible format or with the communication support they require.	January 1, 2010	NHI shall consult the person making the request and provide the documents/information contained on the documents in an accessible format that takes into account the disability in a timely manner and at the regular cost to the individual.	Completed and on-going	
G. Update/revise policies to reflect Integrated Accessibility Standards Regulations (IASR) and the Ontario Human Rights Code	January 1, 2015 – January 1, 2021	Action as stated above is revised based on new updates	Completed and on-going	Ongoing update and assessment
H. Update/revise policies to reflect Integrated Accessibility Standards Regulations (IASR) and the Ontario Human Rights Code	January 1, 2021 - January 1, 2025	Continue to revise policies and make the necessary changes as per AODA	Complete and Ongoing	Ongoing update and assessment
I. Ontario is an accessible province	January 1, 2025	NHI will have met all the accessibility requirements as per AODA		Ongoing updates as necessary

For more information on this Accessibility Plan, please contact Delores Lawrence, President & CEO

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