



## **NHI Nursing & Home Health Care Inc aka NHI - Multi-Year Accessibility Plan**

### **Introduction and Statement of Commitment**

The Ontario government passed the *Accessibility for Ontarians with Disabilities Act (AODA)* in 2005. It is the goal of the government of Ontario to make Ontario accessible by 2025. NHI is committed to complying with the *Accessibility for Ontarians with Disabilities Act, 2005* and all of the standards under it in order to meet the accessibility needs of persons with disabilities in a timely manner.

The regulations associated with the Integrated Accessibility Standards (hereafter referred to as the “IASR”) under the AODA require that effective January 1, 2014, NHI establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under the AODA, the following accessibility standards set certain requirements that are applicable to NHI:

- Customer Service;
- Information and Communications; and
- Employment

This multi-year plan outlines NHI’s strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our commitment as outlined in NHI’s Accessibility Policies.

In accordance with the requirements set out in the IASR, NHI will:

- Post this plan on its website ([www.nhihealthcare.com](http://www.nhihealthcare.com));
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years

### **Overview**

- Accessibility Standards for Customer Service
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## **Accessibility Standards for Customer Service**

### **Commitment:**

The Accessibility Standards for the Customer Service Regulation were created to establish accessibility standards for customer service in Ontario. In keeping with this regulation, the organization is committed to providing respectful services that focus on the unique needs of the individual.

To achieve this, the organization makes reasonable efforts to ensure that its policies, procedures and practices pertaining to the provision of goods and services to the public and other third parties adhere to the following guiding principles as set out in Accessibility Standards for Customer Service: Ontario Regulation 429/07.

- Our goods and services must be provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of our goods or services to persons with disabilities and others must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
- Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.

NHI has been in compliance with the Accessible Customer Service Regulation under the AODA since January 1, 2012.

### **Action Taken:**

The following measures have been implemented by NHI:

- 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 the 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 ServiceOntario's One-Source for Business website.

**Required compliance date: January 1, 2012**

**Status: Completed.**

### **Planned Action:**

- Report continued compliance with the customer service standard on the Accessibility Compliance Reporting tool at ServiceOntario's One-Source for Business website.

**Required compliance date: December 31, 2014**

**Status: Completed.**

# **Integrated Accessibility Standards Regulation**

## **1. Emergency Procedure, Plans or Public Safety Information**

### **Commitment:**

NHI is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making our company premises safer for persons with disabilities during emergency circumstances.

### **Action Taken:**

The following measures were implemented by NHI effective January 1, 2012:

- Emergency procedures, plans and public safety information that are prepared by NHI and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;

**Required compliance date: January 1, 2012**

**Status: Completed.**

## **2. Workplace Emergency Response Information**

### **Commitment:**

Where NHI is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### **Action Taken:**

The following measures were implemented by NHI effective January 1, 2012:

- Where the organization becomes aware of the need to accommodate an employee's disability, and if the employee's disability is such that the individualized emergency response information is necessary, NHI will provide individualized workplace emergency response information to the employee with the disability as soon as practicable after it becomes aware of the need.
- If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, NHI will provide the workplace emergency response information to the person designated by the organization to provide assistance to the employee.
- NHI will review the individualized workplace emergency response information when:
  - the employee moves to a different location in the organization;
  - the employee's overall accommodations needs or plans are reviewed; and/or
  - NHI reviews its general emergency response policies.

**Required compliance date: January 1, 2012**

**Status: Completed and acknowledged.**

## **3. Accessibility Policies and Multi-Year Accessibility Plan**

### **Commitment:**

The organization commits to making its policy documents publicly available, and will provide them in an accessible format upon request.

The organization will:

- 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 our website and provide the plan in an accessible format upon request; and
- Review and update the accessibility plan at least once every five years.

**Required Compliance Date: January 1, 2104**

**Status: Completed and acknowledged.**

#### **4. Self-Service Kiosks (Effective January 1, 2014)**

**Commitment:**

The organization will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

**Required Compliance Date: January 1, 2104**

**Status: Acknowledged.**

#### **5. Training**

**Commitment:**

NHI is committed to implementing a process to ensure that 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.

**Planned Action:**

In accordance with the IASR, NHI will:

- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide goods, services and facilities on NHI's behalf, and persons participating in the development and approval of the NHI's policies;
- Ensure that the training is provided to persons referenced above as soon as practicable;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

**Required compliance date: January 1, 2015**

**Status: Completed and acknowledged.**

#### **6. Information and Communication Standards**

**Commitment:**

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.

#### **Feedback, Accessible Formats and Communication Supports**

**Planned Action:**

In accordance with the IASR, NHI will:

- 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. The organization will notify the public about the availability of accessible formats and communication supports.
- Except as otherwise provided for under the IASR, provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities in a timely manner that takes into account the person's accessibility needs.
- Consult with the person making the request in determining the suitability of an accessible format or communication support.
- Notify the public about the availability of accessible formats and communication supports.

**Required compliance date:**

**January 1, 2015 – Feedback-related provisions**

**Status: Completed.**

**January 1, 2016 – Accessible formats & Communication Supports-related**

**Status: In process.**

**(ii) Accessible Websites and Web Content**

**Planned Action:**

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.

**Required compliance date: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.**

**Status: Level A – Completed and acknowledged. Level AA – In process.**

**7. Employment Standards**

**(i) Recruitment**

**Commitment:**

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.

**Planned Action:**

In accordance with the IASR, NHI will do the following:

**Recruitment General**

NHI will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates.
- Specifying that accommodation is available for applicants with disabilities, on NHI's website and on job postings.

**Recruitment, Assessment and Selection**

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:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- 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.

### **Notice to Successful Applicants**

When making offers of employment, NHI will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates;
- Inclusion of notification of NHI's policies on accommodating employees with disabilities in offer of employment letters.

**Required compliance date: January 1, 2016**

**Status: Completed**

### **(ii) Employee Supports**

#### **Commitment:**

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.

#### **Planned Action:**

In accordance with the IASR, NHI will:

- 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.
- Provide the information required to new employees as soon as practicable after they begin their employment.
- 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.
- 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:
  - Information that is needed in order to perform the employee's job; and
  - Information that is generally available to employees in the workplace.
  - NHI will consult with the employee making the request in determining the suitability of an accessible format or communication support.

**Required compliance date: January 1, 2016**

**Status: Completed**

### **c. Documented Individual Accommodation Plans/Return to Work Process**

#### **Commitment:**

NHI is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of improving accommodation and return to work processes in the workplace.

#### **Planned Action:**

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.

NHI will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

NHI will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- 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.
- 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.

Individual accommodation plans will:

- 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.

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.

**Required compliance date: January 1, 2016**

**Status: Completed**

### **d. Performance Management, Career Development and Redeployment**

#### **Commitment:**

NHI will 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;
- When providing career development and advancement to its employees with disabilities;
- When redeploying employees with disabilities.

**Planned Action:**

In accordance with the IASR, NHI will:

- Review, assess and, as necessary, modify existing policies, procedures, practices and templates to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - Assessing performance
  - Managing career development and advancement
  - Redeployment is required

**Required compliance date: January 1, 2016**

**Status: Completed**