Accessibility Policy and Multi-Year Accessibility Plan

GENERAL REQUIREMENTS

Accessibility Policies and Multi-Year Accessibility Plan

Hope and Healing International has developed, implemented and will maintain policies, including the Accessible Customer Service Policy and this Accessibility Policy, governing how the organization has achieved or will achieve accessibility by meeting its requirements under the Integrated Accessibility Standards Regulation (IASR).

Within this Accessibility Policy, Hope and Healing has also established, implemented, documented and will maintain a Multi-Year Accessibility Plan which outlines Hope and Healing's strategy to identify, remove and prevent barriers and increase accessibility for persons with disabilities, in accordance with Hope and Healing's obligations under the Accessibility for Ontarians with Disabilities Act (AODA).

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five years and will be posted on our website. Upon request, Hope and Healing will provide a copy of the Multi-Year Accessibility Plan in an accessible format.

Actions Taken:

- Accessible Customer Service Policy and Accessibility Policy developed and implemented;
- Multi-Year Accessibility Plan developed and implemented

Required legislative compliance: January 1, 2014

Upcoming Deadlines: next review of Multi-Year Accessibility Plan - 2026

Training Workers

Hope and Healing provides training on the requirements of the accessibility standards referred to in the IASR and on the Code as it pertains to persons with disabilities to all workers.

The training shall be appropriate to the duties of the workers. In that regard, all workers are required to complete the training modules relating to the General Requirements, Accessible Customer Service Standard, Information and Communications Standard, and Employment Standard available via AccessForward.ca. Workers must also complete the training module developed by the Ontario Human Rights Commission on the requirements of the Code pertaining to persons with disabilities, available at

http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda.

New workers must complete the training within 30 days of their start date.

Additional training will be provided to workers as necessary on the content and requirements of this Accessibility Policy, including when changes are made to this Policy. Records of the training provided, including confirmation from workers that the training modules have been completed, including the dates such training was completed, shall be maintained in accordance with the requirements of the AODA. If Hope and Healing provides additional training on this Accessibility Policy to its workers, it will keep records of the date such training was provided and the number of workers the training was provided to.

Actions Taken:

- Instructions with respect to training requirements provided to all current workers and confirmation of completion of all training requirements received;
- Instructions with respect to training requirements to be provided to all new workers as part of orientation process;
- Additional training on accessibility in the workplace scheduled to occur on an ongoing basis;

Required legislative compliance: January 1, 2015

Upcoming Deadlines: ongoing training of new workers and otherwise as necessary

INFORMATION AND COMMUNICATIONS STANDARD

Accessible Websites and Web Content

Hope and Healing's public website and any content published after January 1, 2012 has been updated to meet the requirements of World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, other than certain requirements specifically excluded under the IASR, and except where this requirement is not practicable.

Actions Taken:

Website and web content reviewed and updated for compliance Required legislative compliance: January 1, 2014 / January 1, 2021

Upcoming Deadlines: Hope and Healing will ensure that all new content added to its public website conforms to the guidelines.

Feedback

Hope and Healing has a process for receiving and responding to feedback received from persons with disabilities, as set out in our Accessible Customer Service Policy. Hope and Healing's feedback process is accessible to persons with disabilities as we have provided multiple ways in which customers may provide such feedback, and by making it clear that Hope and Healing will provide, or will arrange for the provision of, accessible formats and communications supports upon request. The availability of accessible formats and communication supports is posted on our website.

Actions Taken:

- Hope and Healing has developed an accessible feedback process as described in our Accessible Customer Service Policy;
- Information about the feedback process, and the availability of accessible formats and communication supports, is posted on Hope and Healing's website;

Required legislative compliance: January 1, 2015

Upcoming Deadlines: ongoing review of any feedback received and any requests for accessible formats and communication supports

Accessible Formats and Communication Supports

Upon request, Hope and Healing will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities in connection with their communications with the organization or when accessing information or documents from the organization. Hope and Healing will do so in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.

Hope and Healing will consult with the person making the request in determining the suitability of an accessible format or communication support. The availability of accessible formats and communication supports is posted on our website.

Hope and Healing will provide emergency and public safety information, plans and procedures, maps and warning signs at evacuation points, and any other emergency alert information, in accessible formats or with appropriate communication supports, upon request.

Actions Taken:

- Hope and Healing has selected a designated individual who will receive and respond to any requests for accessible formats and communication supports;
- The availability of accessible formats and communication supports is posted on Hope and Healing's website;

Required legislative compliance: January 1, 2016

Upcoming Deadlines: ongoing review of any requests for accessible formats and communication supports.

EMPLOYMENT STANDARD

The entitlements and obligations set out herein apply only with respect to applicants and employees of Hope and Healing, as defined above.

Recruitment, Assessment or Selection Process

Hope and Healing notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process by including information on the availability of accommodation for applicants in any job posting, whether posted internally or externally.

Hope and Healing will notify applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Hope and Healing will 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.

Actions Taken:

- Hope and Healing has ensured that all job postings include a statement with respect to the availability of accommodation for applicants;
- Hope and Healing's recruitment process includes notifying applicants who are selected to participate further in the selection process that accommodations are available upon request, and consultation with any applicant that requests an accommodation to provide for a suitable accommodation, as described above;

Required legislative compliance: January 1, 2016

Upcoming Deadlines: ongoing accommodation of applicants, as requested

Notice to Successful Applicants

When making offers of employment, Hope and Healing will notify the successful applicant of its policies for accommodating employees with disabilities by including a statement in the covering email enclosing the offer of employment that Hope and Healing has policies in place with respect to the accommodation of employees, and by providing all employees with a copy of this Manual, which includes this Accessibility Policy.

Actions Taken:

- The covering email enclosing all offers of employment includes a statement that the organization has policies in place with respect to the accommodation of employees;
- All employees receive a copy of this Manual as part of the orientation process, which includes this Accessibility Policy;

Required legislative compliance: January 1, 2016

Upcoming Deadlines: ongoing provisions of the Manual to Employees.

Informing Employees of Supports

Hope and Healing informs its employees of its policies (and any changes to those policies) used to support 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, by providing employees with a copy of this Manual, which includes this Accessibility Policy, and through training on the AODA.

Hope and Healing will provide this information to new employees as soon as practicable after commencing employment, as part of the orientation process.

Actions Taken:

- All employees are provided with a copy of the Manual which they are required to review;
- All employees are required to complete training on the AODA and the Code, as set out herein;

Required legislative compliance: January 1, 2016

Upcoming Deadlines: provide notice to employees whenever the Accessibility Policy is updated

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Hope and Healing will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Hope and Healing will consult with the employee making the request.

Actions Taken:

Hope and Healing is committed to providing employees with accessible formats and communication supports on request;

Required legislative compliance: January 1, 2016 **Upcoming Deadlines:** consider requests for accessible formats and communication supports from employees on an ongoing basis

Workplace Emergency Response Information

Hope and Healing is committed to ensuring the safety of all of its employees in the event of a workplace emergency. Hope and Healing expects that where an employee has a disability, including a temporary injury or medical condition, that could impact the employee's ability to safely respond in the event of a workplace emergency, the employee will alert Hope and Healing to any possible barriers the employee may face, including details of the extent of any restrictions or limitations the employee may experience.

Employees should contact Human Resources immediately if they have any concerns relating to their ability to respond safely in the event of a workplace emergency. The information provided by an employee pursuant to this section will be used by Hope and Healing to design an individualized workplace emergency response plan to help an employee overcome any barriers they may face in the event of a workplace emergency.

All new employees will be advised of the availability of individualized workplace emergency response plans during the orientation process. Existing employees will be reminded of their obligation to report any concerns relating to their ability to safely respond in the event of a workplace emergency on an annual basis, and whenever this Accessibility Policy is updated.

All information provided by employees pursuant to this section will remain confidential, except to the extent disclosure is necessary in order to assist the employee pursuant to their individualized workplace emergency response plan.

Employees are not required to provide details regarding their medical condition or disability, only about the type of help or assistance the employee may need in an emergency.

Individualized workplace emergency response plans will be reviewed whenever an employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when Hope and Healing reviews its general emergency response policies.

Actions Taken:

- Hope and Healing has advised all current employees that if they have a disability that could impact their ability to safely respond in the event of an emergency, they must speak with Human Resources so that an individualized workplace emergency response plan can be developed;
- New employees are advised that Hope and Healing will provide individualized workplace emergency response plans as required during the orientation process;

Required legislative compliance: January 1, 2012

Upcoming Deadlines: continue to include a discussion with respect to

individualized workplace emergency response plans as part of orientation, continue working with employees to develop individualized workplace emergency response plans as required

Documented Individual Accommodation Plans

The duty to accommodate is required of all employers, in all jurisdictions in Canada, and encompasses providing respect and dignity, individualized accommodation, integration and participation, and barrier-free designs. Hope and Healing will provide individual accommodations to support the needs of employees with disabilities up to the point of undue hardship. Individual accommodation plans will be designed to allow employees to contribute and participate in job related functions and activities to the best of their abilities. The process of accommodating individuals will take a consultative approach and is a shared obligation of the organization, the employee, and any applicable professionals required to assist the employee throughout the process.

When developing individual accommodation plans, Hope and Healing will follow the process set out below:

- Hope and Healing will consult with an employee who requires an accommodation in the workplace before developing an individual accommodation plan for the employee.
- Employees who require accommodation in the workplace are required to cooperate with the accommodation process, including providing Hope and Healing with medical information and documentation setting out the employee's accommodation needs, restrictions and limitations.
- Employees are encouraged to openly discuss their accommodation needs, as well as any medical restrictions and limitations, with Hope and Healing.
- If appropriate in the circumstances, Hope and Healing may request that an employee undergo an evaluation by an independent medical or other expert to determine the employee's individual accommodation needs, including any medical restrictions or limitations. The costs of any such evaluation by an independent medical or other experts will be paid for by Hope and Healing. We will refer to the results of any evaluation conducted by an independent medical or other expert to assist in determining whether and/or how the employee can be best accommodated in the workplace.
- Hope and Healing will consider the employee's individual accommodation needs, as communicated to Hope and Healing by the employee and as described in any medical information received in regards to the employee, and will develop an appropriate and reasonable individual accommodation plan which takes into account the employee's medical restrictions and imitations.
- Hope and Healing will provide the employee with an opportunity to provide comments and feedback on the individual accommodation plan before the individual accommodation plan is implemented. Where appropriate, Hope and Healing may revise the individual accommodation plan based on the employee's comments.

In advance of any meeting with Hope and Healing to discuss the development of an individual accommodation plan, an employee may submit a request in writing to Human Resources to have a representative from Hope and Healing participate in the development of the individual accommodation plan, including a member of the JHSC or a Manager. Where the representative proposed by the employee is not appropriate, Hope and Healing will suggest a substitute representative for the employee. The employee understands that the representative may be privy to personal information, including any medical information received, regarding the employee as a result of the representative's participation in the development of the individual accommodation plan.

Hope and Healing will implement the individual accommodation plan in the workplace. If, during the implementation of the individual accommodation plan, an employee experiences difficulties or has concerns regarding the individual accommodation plan, the employee should raise these concerns immediately with Human Resources. Where appropriate, Hope and Healing may make adjustments to the individual accommodation plan based on feedback received from the employee. In some cases, an employee may be required to provide updated medical information to Hope and Healing prior to changes being made to the individual accommodation plan.

Hope and Healing will take all necessary steps to ensure the protection and privacy of the employee's personal information, including any medical information received. An employee's medical information shall be stored in secure location separate and apart from the employee's regular personnel file and will be accessible only by those employees who are involved in the development and implementation of the employee's individual accommodation plan. Hope and Healing shall maintain the confidentiality of the employee's personal information and shall not disclose the employee's personal information to any third party without the consent of the employee, except as required by law.

An individual accommodation plan shall be reviewed and may be updated as often as is necessary to ensure the safe and reasonable accommodation of the employee. At a minimum, the individual accommodation plan shall be reviewed whenever:

- an employee's accessibility needs change;
- an employee moves to a different location or position within Hope and Healing;
- an employee, or an employee's Manager, communicates any concerns in regards to the individual accommodation plan; or
- Hope and Healing receives new medical information in regards to the employee.

Hope and Healing will take all reasonable steps to provide an employee with individual accommodation in the workplace. If, for any reason, Hope and Healing is unable to provide an employee with individual accommodation in the workplace, Hope and Healing will meet with the employee to explain the reasons why Hope and Healing is unable to accommodate the employee. Hope and Healing will consult with an employee who requires an individual accommodation plan to ensure that the individual accommodation plan is provided to the employee in a format that takes into account the employee's accessibility needs due to disability.

Information regarding accessible formats and communications supports provided to an employee, if any, will also be included in an individual accommodation plan. In addition, an individual accommodation plan will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided to the employee.

For more information regarding Hope and Healing's policies relating to accommodation, including a sample Request for Reasonable Accommodation form and Functional Abilities Form, please see our Accommodation Policy and Procedure attached in the Employee Manual as Appendix E.

Actions Taken:

The Company has developed a policy, as noted above, with respect to the development of individual accommodation plans for employees.

Required legislative compliance: January 1, 2016

Upcoming Deadlines: continue to work with employees to develop individual accommodation plans as necessary, in accordance with this policy.

Return to Work Process

Hope and Healing is committed to ensuring the safe and successful return to work of those employees who have been absent from work due to a disability. The return-to-work process, including the development of individual accommodation plans, is the responsibility of Human Resources.

Those employees who have been absent from work as a result of a workplace injury and who received benefits pursuant to the WSIA shall return to work in accordance with the return-to-work process established by the WSIA.

For all other employees who have been absent from work due to a disability, and who require disability-related accommodations in order to return to work, Hope and Healing shall follow the return-to-work process established below:

- In order to provide the greatest chance of a successful return to work, Hope and Healing will require the employee to provide medical information from the employee's treating physician or specialist stating that the employee is fit to return to work, and setting out the employee's accommodation needs, medical restrictions and limitations, if any.
- Once an employee's treating physician or specialist has approved the employee to return to work, Hope and Healing will consult with the employee, either in person or over the phone, to discuss:
 - $\,\circ\,$ any concerns the employee has in regards to returning to work;

- the medical information received by Hope and Healing in regards to the employee's medical restrictions and limitations; and
- the development and implementation of an individual accommodation plan to be put in place upon the employee's return to work.
- Hope and Healing will consider the employee's individual accommodation needs, as communicated to Hope and Healing by the employee and as described in any medical information in regards to the employee, and will develop an appropriate and reasonable individual accommodation plan which takes into account the employee's medical restrictions and limitations.
- Hope and Healing will follow the process described above for the development and implementation of an individual accommodation plan.
- The individual accommodation plan shall be put in place immediately upon the employee's return to work. Depending on the nature of the employee's disability, the individual accommodation plan may serve as a transitional plan which assists the employee to integrate back into their regular duties and responsibilities, or may provide long term, ongoing accommodation for the employee.

Actions Taken:

Hope and Healing has developed a policy, as noted above, with respect to the return-to-work process.

Required legislative compliance: January 1, 2016

Upcoming Deadlines: continue to work with employees to provide a safe return to work, in accordance with this policy.

Performance Management, Career Development and Advancement & Redeployment

Hope and Healing will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Actions Taken:

Hope and Healing has committed to considering the accessibility needs of employees with disabilities whenever it conducts performance management, provides career development and advancement, or when redeploying employees.

Required legislative compliance: January 1, 2016

Upcoming Deadlines: continue to act in compliance with this policy

CUSTOMER SERVICE STANDARD

Hope and Healing is in compliance with all requirements set out in the Customer Service Standards. For more detailed information in this regard, please see our Accessible Customer Service Policy.

Actions Taken:

- Hope and Healing has developed an Accessible Customer Service Policy in compliance with the requirements of the Customer Service Standards;
- The Accessible Customer Service Policy is posted on our website and available to members of the public;
- Hope and Healing has developed a procedure to notify the public of temporary service disruptions;
- Instructions with respect to training requirements have been provided to all current workers and confirmation of completion of all training requirements received;
- Instructions with respect to training requirements shall be provided to all new workers as part of the orientation process;
- Additional training on accessibility in the workplace will occur on an ongoing basis;
- Hope and Healing has developed an accessible feedback process;
- Notification of the availability of the Accessible Customer Service Policy, and details regarding the feedback process, are posted on our website;

Required legislative compliance: January 1, 2012

Upcoming Deadlines: continue to act in compliance with this Policy, including reviewing and updating this Policy as necessary, provide training to employees, receiving and responding to feedback, and continuing to alert the public to the availability of documents pursuant to this Policy, in addition to our feedback process and the availability of accessible formats and communication supports.

TRANSPORTATION STANDARD

Hope and Healing is not a transportation service provider. Should we provide transportation services in the future, we will ensure compliance with the requirements of the AODA.

Actions Taken: n/a Required legislative compliance: n/a Upcoming Deadlines: n/a

DESIGN OF PUBLIC SPACES STANDARD

Hope and Healing currently has no plans to construct or substantially redevelop any publicly accessible spaces as identified in the IASR. Should Hope and Healing initiates any such construction or redevelopment in the future, it will comply with the applicable technical requirements as set out in the IASR.

Actions Taken: n/a Required legislative compliance: n/a Upcoming Deadlines: n/a

CONTACT FOR QUESTIONS

For questions related to this Policy, please contact: Human Resources using any of

the methods identified in our Accessible Customer Service Policy.

Last Revision: February 16, 2024