



Brightshores Health System

AODA MULTI-YEAR ACCESSIBILITY PLAN

2023 - 2028

April, 2023

Our Commitment:

The Ontario Government passed the Accessibility for Ontarians with Disabilities Act (AODA) in 2005 with the goal of making Ontario accessible by 2025. Brightshores Health System (Brightshores) is committed to this vision. We continuously strive to ensure equal access to our services for persons with disabilities and meet the accessibility needs of those we serve in a timely manner.

The regulations associated with the Integrated Accessibility Standards (hereafter referred to as the IASR) require Brightshores to 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.

This multi-year plan outlines Brightshores' strategy to prevent and remove barriers to address the current and future requirements of the AODA.

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

- Post this plan on our website;
- Provide this plan in an accessible format, upon request;
- Post an annual status update on website;
- Review and update this plan at least once every five years

Accessibility Advisory Forum

The hospital has a fluid, open working group called *Your Voice* where internal and external stakeholders are able to:

- Assist with:
 - The input and creation of the multi-year Accessibility plan as well as annual updates
 - Identifying and prioritization of barriers, opportunities and training
 - The implementation and evaluation of aforementioned barriers, opportunities and training
- Provide feedback on all aspects of Accessibility

This working group meets on a regular basis and provides recommendations to the *Your Voice* steering committee which is compiled of respective members of the Executive team.

Interested participants can provide input via our [Accessibility Survey](#) or email yourvoice@Brightshores.on.ca.

Integrated Accessibility Standards Work Plan & Status Update

As outlined below, Brightshores is committed to meeting all standards as required by the IASR.

AODA Requirement	Deliverable	Activities	Status/Update of Compliance
General			
Reg. 191/11 s.3 Establish Policies	Develop, implement and maintain policies governing how the organization will achieve accessibility through meeting its requirements referred to in this regulation.	Policy established and posted, provided in an accessible format upon request.	Compliant (2012) Updated: Aug 2022 <i>Policy: ADMIN 905</i>
Reg. 191/11 s.4 Accessibility Plan	Establish & implement and maintain multi-year accessibility plan, meeting requirements under the regulation. Post the plan on website. Review and update the accessibility plan at least once every 5 years. Review and update plans in consultation with persons with disabilities.	Create plan, involving applicable departments, Accessibility Committee as well as advisors or caregivers with disabilities. Post on website and provide report in an accessible format upon request. Post annual status report on website.	Compliant (2013) Updated: Dec 2022
Reg. 191/11 s. 5 Procuring or acquiring goods, services or facilities	Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities.	Vendors and potential suppliers are asked to tell us about the accessible options offered. Brightshores reminds all staff when making purchases to consider accessibility criteria.	Compliant (2013) Reviewed: Dec 2022
Reg. 191/11 s. 6 Self-Service Kiosks	Incorporate accessibility features when designing, procuring or acquiring self-service kiosks.	Brightshores reminds all staff when making purchases to consider accessibility criteria.	Compliant (2013) Reviewed Dec 2019
Reg. 191/11 s. 7 Training	Provide training to all employees, volunteers, physicians and other service providers on the laws of accessibility and the Ontario Human Rights Code as it pertains to persons with disabilities.	Employees are trained via e-learning upon hire. The training record is kept in their Learning Management System. Volunteers receive in-person AODA training within their onboarding process.	Compliant (2015) On-going Reviewed: Dec 2022
Information & Communication Standards			
Reg. 191/11 s. 11 Feedback	Ensure processes for receiving and responding to feedback are accessible to persons with disabilities, upon request. Notify public about the availability of accessible formats.	Brightshores' external website has an <i>Accessibility Survey</i> available. Feedback can also be made via telephone, email and in person through the Patient Relations department.	Compliant. Reviewed: Dec 2022

AODA Requirement	Deliverable	Activities	Status/Update of Compliance
		<p>Internally, employees can submit feedback directly to the patient relations department.</p> <p>In addition to real-time feedback, Brightshores completes annual <i>accessibility planning reviews</i> in each area and at each site with both front-line employees and leaders.</p>	
Reg. 191/11 s.12 Accessible Formats and Communications supports	Provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request, with consultation of requestor and in a timely manner. Notify the public about the availability of accessible formats and communication supports.	Post on external Brightshores website the availability of accessible formats upon request and in consultation with requester.	Compliant Reviewed: Dec 2022
Reg. 191/11 s. 13 Emergency Procedure, plans and public safety	Provide emergency procedures, plans and public safety information in an accessible format as soon as practicable, upon request.	Upon request, emergency procedures will be made available in alternate formats, with consultation of requester.	Compliant (2012) Reviewed: Dec 2022
Reg. 191/11 s. 14 WCAG 2.0 Level AA	All Internet websites and web content must conform with WCAG 2.0 Level AA (excluding live captioning and pre-recorded audio descriptions)	Revise internet website to conform to WCAG 2.0 Level AA requirements.	Complete (2021). Reviewed: Dec 2022
Employment Standards			
Reg . 191/11 s. 22 Recruitment, General	Notify employees and public about the availability of accommodation for applicants with disabilities in recruitment processes.	Statement on all job postings and career website internally and externally.	Compliant (2014) Reviewed: Dec 2022
Reg . 191/11 s. 23 Recruitment, assessment or selection process	Notify applicants once selected in assessment process that accommodations are available upon request in relation to materials or processes to be used. If requested, consult with applicant and provide arrangement that accounts for	When inviting all applicants for interview, notify that accommodations are available, if requested. Assess each request on an individual basis to accommodate.	Compliant (2014) Reviewed: Dec 2022

AODA Requirement	Deliverable	Activities	Status/Update of Compliance
	the applicant's accessibility needs.		
Reg . 191/11 s. 24 Notice to Successful Applicants	When making offers of employment, notify successful applicant of its policies for accommodating employees with disabilities	As part of their offer of employment, employees shall be notified about the hospital's policies for accommodating employees with disabilities.	Compliant (2014) Reviewed Dec 2022
Reg. 191/11 s. 25 Informing employees of supports (Accommodation)	Every employer shall inform its employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account accessibility needs. Provide this information as soon as practicable after they begin their employment. Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodation	Employees are provided with information surrounding accommodation supports at their health review interview through OH&S upon hire. Should any changes/updates occur to the policy, employees will be notified through annual training modules.	Compliant (2014) Reviewed Dec 2022
Reg. 191/11 s. 26 Accessible formats & Communication supports for employees	When requested, consult the needs and provide in accessible format: a) information needed in order to perform the employee's job and, b) information generally available to employees in the workplace	If requested, all duty outlines and job descriptions will be made available in appropriate formats (based on consultation)	Compliant (2014) Reviewed: Dec 2022
Reg. 191/11 s. 27 Workplace emergency response information	Provide individualized workplace emergency response information to employees who have made aware to their employer the need for accommodation	If needed, individualized work plans will be organized through the OHS department to accommodate those employees who have made their leader aware of their need.	Compliant (2014) Ongoing. As new individuals are identified as having disabilities, more workplace emergency response plans are created. Reviewed Dec 2019
Reg. 191/11 s. 28 Documented individual accommodation plan	Develop a written policy for developing documented individual accommodation plans (IAP)for employees with disabilities	Develop a policy and train all stakeholders on how to develop individualized work accommodation plans.	Compliant (2014) Workplace Accommodation Policy revised July 21st, 2017. Reviewed Dec 2019

AODA Requirement	Deliverable	Activities	Status/Update of Compliance
Reg. 191/11 s. 29 Return to Work Policy	Develop & document a return to work (RTW) policy for those who have been absent from work due to a disability and require disability-related accommodations in order to return to work. RTW shall include steps employer will take to facilitate RTW, and use the individualized accommodation plans	OH&S develop a policy and post. As employees are in process of RTW, OH&S and area leader will work with employee to create IAP and assist the employee to return to work.	Compliant (2014) Reviewed: June, 2022
Reg. 191/11 s.30 Performance Management	Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, with using its performance management process	Management and staff are trained on accommodation practices.	Compliant (2014) Reviewed Dec 2022
Reg. 191/11 s. 31 Career Development and Advancement	Take into account the accessibility needs of employees with disabilities as well as any IAP's when providing career development and advancement to its employees with disabilities.	All internal job postings will state accessibility needs will be taken into account during selection process.	Compliant (2014) Reviewed Dec 2022
Reg. 191/11 s. 32 Redeployment	Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Brightshores follows the redeployment process and ensures accessibility needs are taken into consideration.	Compliant (2014) Reviewed Dec 2022
Transportation Standards			
Reg. 191/11 s.76 Transportation	Provide accessible vehicles or equivalent services upon request.	Accessible transportation is provided when required.	Compliant (2022) Reviewed: Dec 2022
Design of Public Spaces Standards			
Reg. 191/11 s.80 Design of Public Spaces	For new construction and major changes to existing features of public spaces, adhere to design requirements for the following: recreational trails, outdoor public eating areas, outdoor play spaces, outdoor paths of travel, accessible parking, service-related elements like	Facilities Management and Project Management adhere to regulations and new building code in all construction projects. Visual Workplace Inspections (WPI) of all public spaces are performed by Joint Health & Safety team and leadership, at a minimum of	Compliant (2016). Reviewed: Dec 2022

AODA Requirement	Deliverable	Activities	Status/Update of Compliance
	service counters, fixed queuing lines and waiting areas.	annually. Any required maintenance is followed up with a work order to the Facilities Management Department. Temporary disruptions are posted both online & with signage.	

Barrier Types & Identification Methodologies:

Brightshores has identified the following types of barriers and uses barrier identification methodologies as outlined below.

Barrier Types:

Physical, informational, communication, attitudinal, technological & systemic.

Methodologies:

Methodology	Description
Joint Health & Safety Committee (JHSC)	Each area is responsible for completing a monthly <i>Workplace Inspection/Hazard Report</i> and submit to OH&S. These forms have a designated area to identify/report accessibility barriers which are then reviewed with the JHSC.
Annual Accessibility Planning Review	Accessibility Advisory forum members complete annual walk-throughs at each site and provide recommendations to Executive.
Electronic Incident Reporting System	Accessibility issues/complaints are submitted in our Electronic Incident Reporting System and reports are generated and reviewed by the Brightshores Accessibility Committee.
Accessibility for Ontarians with Disabilities (AODA) Act Survey	Survey is available via our website and also in hardcopy at all of our hospitals. Contact information is posted on the website.
Patient Satisfaction Survey	Accessibility specific questions are listed on our patient satisfaction survey.
Capital funding requests for accessibility projects	Requests are reviewed and prioritized through the capital planning and approval process.
Accessibility Advisory Forum	Both Brightshores and Community representation is welcomed and sought out. The forum reviews and prioritizes items on an ongoing basis taking into consideration urgency, time restraints and available funds.

Barriers/Initiatives to be Addressed: 2023 - 2028

Based on the previous multi-year plan and annual review, the following initiatives/barriers have been identified.

Barrier/Initiative Identified	Objective	Status	Status/Target Completion Date
Accessibility Advisory Forum: Enhance participation compilation	Boost membership of internal and external partners to extend reach and enrich feedback.	In progress.	March 2024
Education/Training & Employment: Review, update & implement revised AODA training	Enhance online offerings of AODA training and access to educational materials.	In progress.	March 2024
New Hospital Builds & Renovations: Ensure AODA/IASR compliance	Complete builds & renovations to meet AODA/IASR compliance (Owen Sound Retail Pharmacy, Markdale Hospital, Wellness Centre, CSP).	In progress.	Ongoing
Auditory: Increase understanding on process to request translation/sign language assistance	Review & update translation request process	Complete	September, 2023
Physical: purchase of bariatric chairs for waiting areas	Provide proper seating availability.	In progress	Ongoing
Physical: readjust layout of common areas post-COVID restrictions	Ensure layouts are configured to fit wheelchairs.	In progress	Ongoing
Owen Sound (Dialysis) - Physical	Evaluate options & determine plan to make dialysis bathroom more accessible.		Future Capital Request
Hospital Re-Branding Project: Informational & Communication	Ensure all aspects of new brand roll-out adhere to AODA requirements.	Complete	October 2023
Hospital Intranet Refresh: Informational & Communication	Ensure all aspects of new intranet adhere to AODA requirements.	In Progress.	Summer, 2024

Review & Monitoring Process:

The Accessibility Advisory forum will meet regularly to review progress. At each meeting, forum members will remind staff about their roles in implementing the plan.

Members of the Accessibility Advisory forum also commits to making presentations to the Corporate Leadership Committee, Nursing Practice Council, Joint Health & Safety Committee, and the Board's Quality Committee.

Communication of the Plan:

The hospital's accessibility plan will be available on the *Accessibility* section of the Brightshores website. The plan is communicated to new employees via onboarding orientation.

Accessibility Achievements: 2014 – 2022

During the last several years, there have been a number of initiatives at Brightshores to identify, remove and prevent barriers for people with disabilities. The organization has address the following barriers over the years.

Barrier	Objective	Result	Status
Wiarton: Front entrance doors in Wiarton	Widen to allow better access	Replaced front entrance doors, giving a wider opening for better access	Complete
Wiarton: Door accessibility	Ensure public doors are accessible with operators	Added auto openers to two sets of doors in Wiarton.	Complete
Owen Sound: Accessible washroom	Provide accessibility, support independence, and prevent slips and falls.	Add an accessible washroom on the lower level (currently only one on main level)	Complete
Owen Sound: Accessible Public Outdoor eating areas	Ensure Public Outdoor eating spaces are accessible	Installed accessible picnic tables on 3 rd and 4 th floor courtyards	Complete
Owen Sound: Improve signage and wayfinding in the initial entryway of hospital	Improve signage and wayfinding throughout hospital.		Complete
Owen Sound: Configuration of seating in Ambulatory Care	Improve access to seating in Ambulatory Care		Complete
Owen Sound: Repair of walkways on Owen Sound hospital property	Ensure level walking services		Constant evaluation

Brightshores Multi-Year Accessibility Plan

Barrier	Objective	Result	Status
All Sites: Door accessibility	Ensure public doors are accessible with operators		ongoing
All Sites: Washroom upgrades	Installation of grab bars, raised toilet seats and backrests in public washrooms	Level 1 – Owen Sound Complete October 2023	ongoing