

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES 2005 (AODA)
CUSTOMER SERVICE STANDARD – SERVING PEOPLE WITH DISABILITIES**

Policy No.	PP-SAS-9002	Date Approved	December 2014
Prepared by	Manager, Human Resources	Date Implemented	January 2012
Approved by	Senior Leadership	Date Reviewed	January 2014
		Date(s) Revised	
		Scheduled Review Date	January 2017
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PURPOSE STATEMENT

The stated purpose of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* is: *To achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.*

The Scarborough Centre for Healthy Communities (SCHC) is committed to meeting the requirements of the accessibility standards for customer service, established by AODA regulations, by January 1, 2012. Ontario Regulation 429/07 - Accessibility Standards for Customer Service - applies to every designated public sector organization and to every person or organization that provides goods or services to members of the public or other third parties and that has at least one employee in Ontario.

This policy establishes the accessibility standards for customer service for SCHC, in accordance with the requirements of Ontario Regulation 429/07. SCHC will implement the standards outlined in this policy by January 1, 2012.

OUR COMMITMENT TO SERVICE

We, the staff of SCHC, in compliance with the spirit, intent and provisions of the Ontario Human Rights Code, are committed to providing the highest quality customer service.

This statement of commitment reflects our best efforts to provide excellent customer service, within the limits of our resources by:

- Being sensitive, aware and knowledgeable about the realities of prejudice and discrimination;
- Recognizing and accommodating the diverse needs of our many client groups;
- Providing accessible service, information and materials; and
- Acting on issues brought to SCHC’s attention as quickly as possible while maintaining the high quality of our work.

POLICY

This policy applies to SCHC staff members, volunteers, board members, independent contractors and students who deal with the public.

SCHC 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, align with the following guiding principles, as set out in Ontario Regulation 429/07:

1. The provision of the goods or services is in a manner that respects the dignity and independence of persons with disabilities.
2. Integration of the provision of goods or services to persons with disabilities and others 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.

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3. Giving persons with disabilities an opportunity equal to that given to others to obtain, to use, and to benefit from the goods or services.

Communications:

SCHC supports an accessible Ontario, promoting the independence and integration of those with disabilities. When communicating with a person with a disability, individuals working on behalf of SCHC, do so in a manner that takes into account the person’s disability and makes reasonable efforts to have the person with a disability understand both the content and intent of its communications. We train staff how to communicate with people with various types of disabilities.

Use of Assistive Devices:

SCHC is committed to serving persons with disabilities who use assistive devices to obtain, to use, or to benefit from our services. SCHC provides training on how to interact with persons with disabilities who use assistive devices.

Clients are encouraged to contact SCHC (or staff or manager involved) as early as possible if any special arrangements are required.

Use of Service Animals:

SCHC is committed to welcoming persons with disabilities and their service animals at our multiple locations that are open to the public and other third parties, and welcomes the person to keep the service animal with them. SCHC provides training on how to interact with persons with disabilities who are accompanied by a service animal.

Use of Support Persons:

SCHC is committed to welcoming people with disabilities accompanied by a support person. Any person with a disability accompanied by a support person is welcome to SCHC locations with his or her support person.

On occasion, and if necessary, persons with disabilities may require the assistance of a support person, in order to protect their health and safety, or the safety of others. For health and safety reasons, SCHC may require a support person to accompany a person with a disability.

Notice of Temporary Disruptions in Services and Facilities:

If there is a temporary disruption in SCHC location facilities or services, which are utilized by persons with disabilities, completely or in part, SCHC will provide the public with notice of the disruption as soon as possible after becoming aware of the disruption. This notice will include information about the reason for the disruption, how long it may last, and what other facilities or services are available.

Training:

SCHC is committed to providing training to all employees, volunteers, board members students, independent contractors, and others who deal with the public or other third parties on behalf of SCHC.

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SCHC will maintain and update training as required.

Availability of the Accessible Customer Service Documents:

SCHC will make available any additional documents describing its policies, practices, and procedures as required by Ontario Regulation 429/07 and, upon request, gives a copy of the documents to any person.

In addition, the SCHC Accessibility Standards for Customer Service policy will be posted and available on our intranet and public access website.

Further, SCHC makes reasonable efforts to inform persons to whom it provides services that the documents required under Ontario Regulation 429/07 are available upon request. SCHC gives the person the documents, or the information contained in the documents, described above, in a format that takes into account the person’s disability.

Feedback Process:

SCHC strives to meet and surpass customer expectations while services customers with disabilities. Comments on our services regarding how well those expectations are being met are appreciated.

Feedback may be made in writing or by telephone to:

Scarborough Centre for Healthy Communities
Chief Executive Officer
629 Markham Road, Unit 2
Scarborough, ON M1H 2A4
Telephone: 416-847-4091

DEFINITIONS

The AODA and Ontario Regulation 429/07 contain and refer to various definitions that are relevant to this policy, some of which are set out below.

Assistive Device:

A technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Barrier: anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice (“obstacle”).

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Disability: the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005* and the *Ontario Human Rights Code*, refers to:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997 (“handicap”).

Guide Dog: a highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons’ Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal: as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog: as reflected in *Health Protection and Promotion Act, Ontario Regulation 562*, a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person: as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

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REFERENCED DOCUMENTS

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Ontario Human Rights Code, 1990
- A Practical Guide to the Accessibility Standards for Customer Services, Ontario Regulation 429/07, HRdownloads.com
- Ontario Human Rights Commission, Customer Services Policy: Providing goods and services to people with disabilities: <http://www.ohrc.on.ca/en/commission/about/customerservice>
- Ontario Ministry of Community and Social Services: Accessibility for Ontarians with Disabilities: <http://www.mcsc.gov.on.ca/en/mcss/programs/accessibility/index.aspx>
- Accessibility for Ontarians with Disabilities Act 2005 (AODA) Customer Service Standard – Serving Persons with Disabilities, Policy 1.1.27 South West Community Care Access Centre



ACCESSIBILITY PLAN MULTI-YEAR PLAN

(updated as of November 3, 2014)

Submitted by:

Accessibility Advisory Committee (AAC)
Scarborough Centre for Healthy Communities
629 Markham Rd.
Scarborough, Ontario M1H 2A4
Tel: 416 642-9445
www.schcontario.ca

Additional formats are available upon request.

Note: This document has been prepared in Arial 14 pt.

The Accessibility Plan is also available on our website.

Scarborough Centre for Healthy Communities (SCHC)

Originally founded as West Hill Community Services in 1977, Scarborough Centre for Healthy Communities (SCHC) is one of the most established and comprehensive community health organizations in the province. The organization owes its beginnings to 13 community agencies, a core group of community leaders and countless volunteers who identified emerging health and social needs within Scarborough.

After incorporating and acquiring not-for-profit status, SCHC built on the initial services of our Meals-on-Wheels, home support, transportation and family support programs. After a successful rebranding campaign, we employ over 130 staff, engage over 14,000 volunteers and operate 38 distinct and integrated services across 10 sites that work together to improve the health of our community. We provide medical assistance through our clinics, are involved in a growing youth program and have a multitude of social support programs including a food bank.

In order to remain a client-centered, integrated, engaged and proactive organization, we've continued to work closely with our community members, foster partnerships with initiatives that address pressing needs while setting new standards of excellence. We work tirelessly to offer [programs and opportunities](#) that profoundly impact the health of the communities we serve.

Executive Summary

[Scarborough Centre for Healthy Communities' Vision](#) is to be recognized by our clients, communities and partners as leaders in championing holistic health and wellness for the diverse populations of Scarborough. This 'community' includes people with disabilities.

With the introduction of the Accessibility for Ontarians with Disabilities Act, 2005, SCHC has been examining ways in which we can better serve our population. We are committed to creating a welcoming, barrier-free environment for clients, staff, volunteers and our community. We are also committed to increasing awareness on accessibility issues and providing accessibility supports to those with disabilities.

SCHC will support its community by supporting persons with disabilities: 1) to enter and exit our facilities without encountering barriers, 2) to receive SCHC's services they require without encountering barriers and 3) to work in an inclusive environment without barriers.

The AODA sets-out to improve opportunities for persons with disabilities by providing for their involvement in the identification, removal and prevention of perceived barriers to accessibility. The AODA has the long-term goal of a barrier-free Ontario for people with disabilities by 2025 through the implementation of accessibility standards for the private and public sectors.

The AODA has identified five accessibility standards which SCHC must comply with related to: 1) Customer Service, 2) Transportation, 3) Information and Communication, 4) Built Environment and 5) Employment. The Customer Service standard was the first to be implemented in January 2010.

The AODA also mandates that all health service providers prepare a multi-year accessibility plan. The goal of the plan is to remove existing barriers and prevent new ones. The Plan is to be developed: 1) in consultation with persons of disabilities, either from the community, internal parties or an accessibility advisory committee; 2) the plan must be made public and in accessible format(s) upon request, and (3) SCHC must review and update the accessibility plan yearly.

Scarborough Centre for Health Communities Annual Accessibility Plan was prepared by the Accessibility Advisory Committee (AAC), and it summarizes the measures that SCHC has taken in the past, along with the measures the Hospital will take between 2013-2015 to identify, remove and prevent barriers for persons with disabilities.

Accessibility Advisory Committee (AAC)

Accessibility issues are addressed by the Accessibility Advisory Committee (AAC) which was established in November 2010 and is comprised of SCHC's staff. The Committee is chaired by the Manager of Human Resources

Review Process

The AAC identifies, removes and prevents barriers to people with both visible and invisible disabilities, including clients, staff, volunteers and community. The Committee will:

- Review by-laws, policies, programs, practices and services that cause or may cause barriers to people with disabilities and make recommendations for improvement;
- Monitor the implementation and ongoing compliance with the five standards outlined in the Accessibility for Ontarians with Disabilities Act, 2005;
- Identify, review, prioritize and remove barriers to accessibility;
- Review feedback received internally and externally regarding barriers and respond accordingly;

- Disseminate information to appropriate groups in order to prevent the inclusion of accessibility barriers in remodelled/new construction
- Raise organizational awareness and education on accessibility issues, barriers and government legislation;
- Develop communications designed to promote staff understanding and sensitivity to the accessibility issues of people with disabilities;
- Prepare the Accessibility Plan and ensure available to internal and external stakeholders;
- Promote the work of the Accessibility Advisory Committee (AAC).

Accessibility of Ontarians with Disabilities Act (AODA)

In 2005, the Ontario Government passed a law called the *Accessibility for Ontarians with Disabilities Act (AODA)* to ensure a more accessible province for people with disabilities. The goal of the AODA is for all of Ontario to be fully accessible by 2025 and all public sector organizations, including non-profit organizations, must be in compliance by 2021.

The purpose of the AODA is to develop, implement and enforce standards of accessibility for all Ontarians. The standards will ensure that there are established measures, policies, practices or other requirements for the identification and removal of barriers to accessibility.

Several accessibility standards are contained in one regulation under the AODA, called the Integrated Accessibility Standards Regulation (IASR) which was released and became law in July 2011.

Five key areas in the IASR have been developed:

- **Customer Service:** Service delivery to the public, business practices and employee training.
- **Information and Communication:** Information and communications provided to the client or end-user through print, telephone, electronic devices, and in-person. This includes publications and software applications.
- **Employment:** Hiring and retaining employees, including employment practices, policies and processes such as job advertisements and interviewing.
- **Transportation:** Reflects a variety of environments, financial capabilities of users/providers and the differing modes of travel including conventional and specialized modes, and on-demand taxi services.
- **The Built Environment:** Access to, from and within buildings and outdoor spaces. This also includes counter heights, aisles, door widths, parking, signage, pedestrian access routes and signal systems.

Definitions

- **Accessible** - Accessible means that customer service is provided in a way that is capable of being easily understood or appreciated, that is easy to get at, be reached, or entered. It is equally obtainable to all.
- **Disability** - As defined in Section 2 of the *Act*, Disability means:
 - Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog , or other animal or on a wheelchair or other remedial appliance or device;
 - A condition of mental impairment or a developmental disability;
 - A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
 - A mental disorder; and/or
 - An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

This definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

- **Barrier** - A barrier is anything that stops a person with a disability from fully participating in society. Barriers are classified by the following types: physical, attitudinal, architectural, technological and information or communications, policy or practice.

INITIATIVES COMPLETED IN 2011-2013 INITIATIVE	STANDARD	DESCRIPTION/STATUS
Develop policies on implementing IASR and include a statement of organizational commitment by January 2013. <i>(mandatory requirement)</i>	General Requirements	<p>Completed: Corporate policy, “Accessibility for People with Disabilities”.</p> <p>Human Resources policies comply with Employment Standard and align with above corporate policy.</p>
Develop a multi-year accessibility plan and ensure a review every five years with an annual status report and plan made public by January 2013. <i>(mandatory requirement)</i>	General Requirements	<p>Completed: SCHC has multi-year plan in place as of January 1, 2013.</p>
Incorporate accessibility criteria into procuring goods and services by January 2013. <i>(mandatory requirement)</i>	General Requirements	<p>Completed: Incorporated accessibility criteria and features when procuring or acquiring goods, services or facilities. All buyers will incorporate accessibility criteria when dealing with potential vendors.</p> <p>Suppliers will review procurement and capital purchases to ensure accessibility criteria are being met.</p> <p>Purchasing department will consider potential accessibility needs of Patients and staff when procuring and processing requisitions.</p>

INITIATIVES COMPLETED IN 2011-2013 INITIATIVE	STANDARD	DESCRIPTION/STATUS
Train all employees on the IASR and the Ontario Human Rights Code and track completion of training by January 2014. (mandatory requirement)	General Requirements	<p>Completed: Mandatory training on IASR standards via eLearning modules (HR Downloads) has been available online to all new and current staff.</p> <p>If any changes are made to the course, all new and current staff will be required to retake it. Refresher courses are available.</p> <p>As part of new employee orientation, staff are provided with dedicated time to complete the eLearning module on Accessibility.</p>
Call Ahead for Assistance	Customer Service	Clients can call for assistance in being able to attend services at SCHC.
Assisted Devices	Customer Service	A variety of Assisted Devices are available at SCHC for staff to utilize. A listing of these devices is available on the SCHC intranet.
A process for receiving and responding to patient feedback should be in an accessible format, if requested by January 2014. (mandatory requirement)	Information and Communication	Clients can provide complaints and compliments via several accessible ways: online form, telephone, in-person, writing and comment cards.
		Employees can provide feedback in multiple ways: employee opinion survey, staff meetings and directly to Human Resources.

INITIATIVES COMPLETED IN 2011-2013 INITIATIVE	STANDARD	DESCRIPTION/STATUS
Emergency and public safety information for the public made accessible upon request by January 2012.	Information and Communication	SCHC is not required to make our emergency and public safety information public under the Emergency Management and Civil Protection Act. However, upon request SCHC can make this information public in an accessible format.
<p>Accessible Web Content to WCAG 2.0 A standard for new website content.</p> <p>By January 2, 2021 all internet web content and documents need to be accessible conforming to WCAG 2.0 Level AA standards. (mandatory requirement)</p>	Information and Communication	SCHC is currently re-designing the organizations internet website which will meet both WCAG 2.0 A and AA Standards.
Provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request by January 2015. (mandatory requirement)	Information and Communication	Upon request, SCHC will provide accessible documents, materials or information in alternative formats
Notify Employees and public about accommodation in the recruitment process by January 2014. (mandatory requirement)	Employment	<p>SCHC job posting sites advises applicants that SCHC supports compliance by AODA.</p> <p>Applicants can advise SCHC if accommodation is required.</p>

INITIATIVES COMPLETED IN 2011-2013 INITIATIVE	STANDARD	DESCRIPTION/STATUS
Notify applicants of accommodation in recruitment during assessment/selection process by January 2014. (mandatory requirement)	Employment	Applicants receive an email when selected for a screening interview with the following message: "SCHC is compliant with the AODA standards" "Accommodations are available upon request in relation to the materials or processes to be used to support your participation in the process"
Notify when making offers of employment of accommodation policies by January 2014. (mandatory requirement)	Employment	Employment offer letters now advise employees who require accommodation to contact Human Resources.
Inform all employees of supports available, and update when changes are made by January 2014. (mandatory requirement)	Employment	Recruitment intranet page advises all employees that SCHC is compliant with AODA standards and accommodations are available upon request in relation to materials and processes.
Provide accessible formats and communication supports to employees by January 2014. (mandatory requirement)	Employment	Online policies can be enlarged for easier viewing; accessible fonts available for human Resources documentation; managers involved in supporting communication with individuals on accommodation plans to ensure communication is accessible to them.

INITIATIVES COMPLETED IN 2011-2013 INITIATIVE	STANDARD	DESCRIPTION/STATUS
<p>Individualized workplace emergency response information for employees with disabilities by January 2012. (mandatory requirement)</p>	<p>Employment</p>	<p>Workplace emergency response information for employees with disabilities are in place, specific to their individual needs. SCHC emergency response plans contain information for employees with disabilities regarding the process for development of an individualized safety plan should one be required. Employees requiring assistance should self-identify themselves to their Manager.</p>
<p>Establish a written process for documenting individual accommodation plans by January 2014. (mandatory requirement)</p>	<p>Employment</p>	<p>Where there is a need for accommodation, a written accommodation plan is developed with the employee's Manager, Human Resources and their union, if applicable.</p>
<p>Return to Work Process documented by January 2014. (mandatory requirement)</p>	<p>Employment</p>	<p>Human Resources has a return to work process for employees returning to work after an injury, accident or illness that helps transition them back into their previous or new position.</p>
<p>Performance management shall take into account accessibility needs and accommodation plans by January 2014. (mandatory requirement)</p>	<p>Employment</p>	<p>Managers are made aware of any accommodation needs that have been brought forward by their staff or by Human Resources. These needs should be taken into account when evaluating and meeting with their staff.</p>

INITIATIVES COMPLETED IN 2011-2013 INITIATIVE	STANDARD	DESCRIPTION/STATUS
Career development and advancement incorporates accessibility and accommodation plans by January 2014. (mandatory requirement)	Employment	When internal candidates apply for a job posting, the following is reviewed with them: "SCHC supports the compliance of the AODA and asks that job applicants needing accommodation advise SCHC so that suitable accommodation can be arranged that takes into account the applicant's accessibility needs."
Redeployment activities will take into account accessibility needs and accommodation by January 2014. (mandatory requirement)	Employment	Employees who are being redeployed into another position are pre-screened for their qualifications in the new role and are also asked whether or not accommodation needs are required so that employees can continue to have their accommodation needs met.
Pre-Placement.	Employment	An updated pre-placement questionnaire used for new hires includes questions to identify employees with accessibility needs.
Assistance for People with Disabilities	Employment	Human Resources has a disability management program that supports employees with temporary or permanent accommodation needs. Exit plans are in place for all employees who have permanent disabilities and who have potential need for assistance in the event of an emergency.

INITIATIVES COMPLETED IN 2011-2013 INITIATIVE	STANDARD	DESCRIPTION/STATUS
Accommodation and Work Templates	Employment	Permanent accommodation and modified work templates have been updated to include a section which identifies when an employee has accessibility needs during an emergency situation.
By July 2011, designated public sector organizations that are not primarily in the business of transportation, but that provide transportation services shall provide accessible vehicles or equivalent services upon request. (mandatory requirement)	Transportation	Clients with a disability can use various modes of transportation, i.e. Wheel Trans and our own vehicles which currently support the needs of clients.
By January 2016, meet accessibility requirements if entered into a newly constructed or redeveloped contract on or after January 2013. (mandatory requirement)	Built Environment	SCHC will ensure legislative requirements are met when entering into a contract for new construction or making changes to existing features. SCHC adheres to the Building Code.
Ensured accessibility in new construction and remodelling.	Built Environment	SCHC ensures accessibility requirements are now incorporated into new construction and remodelling at SCHC.

**PROPOSED INITIATIVES FOR
2013- 2015**

Accessibility Advisory Committee	Overall Corporate	Increase community representation Accessible Advisory Committee and ensure appropriate SCHC representation.
Budgets	Overall Corporate	Identify budget for accessibility priority items.
Internet Website	Information and Communication	Updated SCHC website will reflect provincially mandated accessibility criteria.
Format of Communication Materials	Information and Communication	Ensure communication materials (printed and online) are appropriately designed to meet accessibility standards, including colour, fonts, language, etc.
Communications Plan	Information and Communication	Develop communications plan to support and promote awareness to staff around accessibility issues.
Exit Plans for Emergencies	Employment	Develop written "Exit Plans" for all employees with permanent disabilities and who have the potential need for assistance in the event of an emergency.
Accessible Washrooms	Built Environment	<p>Conduct an audit of all washrooms to identify accessibility requirements and costs.</p> <p>Improve accessibility of washrooms by installing L type grab bars.</p> <p>Install accessible automatic door opener where needed.</p>