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| <b>Manual: Policy &amp; Procedures</b>  | <b>Section: How we Uphold our Values</b> |
| <b>Subject: Information and Communication Policy (AODA)</b>                           | <b>Date Approved: March 2019</b>         |
| <b>Approved by: Board of Directors</b>  | <b>Date Reviewed: February 2019</b>      |
| <b>Applicability: Board of Directors, staff, students, volunteers and contractors</b> |  |

**Policy Statement:**

The Information and Communication Policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the *Information and Communications Standard* set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*.

This policy applies to the provision of information and communication services and materials for people with disabilities. All information and communications materials and services provided by Vibrant Healthcare Alliance shall follow the principles of dignity, independence, integration and equal opportunity.

**Definitions:**

**AODA** - Accessibility for Ontarians with Disabilities Act, 2005.

**Integrated Accessibility Standards Regulation (IASR)** applies to all public, private and not- for –profit organizations. The IASR are legislated requirements organizations must meet in order to met AODA obligations in the areas of Information, Communications, Employment and Transportation.

**Accessible Formats** – include but not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**Communication Supports** – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**Conversion Ready** – an electronic or digital format that facilitates conversion into an acceptable format.



**Designated Public Sector Organization** – refers to every municipality and every person or organization listed in Column 1 of Table 1 of *Ontario Regulation 146/10* (Public Bodies and Commission Public Bodies—Definitions) made under the [Public Service of Ontario Act, 2006](#).

**Extranet Website** – a controlled extension of the intranet, or internal network of an organization to outside users over the Internet.

**Information** – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

**Internet Website** – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.

**Intranet Website** – an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.

**Support Person** – in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

**Web Content Accessibility Guidelines** – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- 1) General Requirements
- 2) Accessible Formats and Communication Supports
- 3) Accessible Websites and Web Content
- 4) Emergency Procedures, Plans or Public Safety Information
- 5) Exceptions
- 6) Feedback



## **1. General Requirements**

General requirements that apply across all of the three standards, Information and Communications, Employment and Transportation are outlined as follows.

### **Establishment of Accessibility Policies and Plans**

Vibrant Healthcare Alliance will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. Vibrant Healthcare Alliance is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This will be achieved through documentation in Vibrant Healthcare Alliance's policies and making these documents publicly available, in an accessible format upon request.

Vibrant Healthcare Alliance will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. Vibrant Healthcare Alliance will post its accessibility plans on its website and provide the plan in an accessible format upon request. Vibrant Healthcare Alliance will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement Vibrant Healthcare Alliance's accessibility plan. These status reports will be posted on Vibrant Healthcare Alliance's website. If requested, the reports shall be created in an accessible format.

### **Procuring or Acquiring Goods and Services, or Facilities**

Vibrant Healthcare Alliance will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

### **Training Requirements**

Vibrant Healthcare Alliance will provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code. Training will be provided for individuals who are responsible for developing Vibrant Healthcare Alliance's policies, and all other persons who provide goods, services or facilities on behalf of the organization.



## **2. Accessible Formats and Communication Supports**

Vibrant Healthcare Alliance will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no cost to the individual. Vibrant Healthcare Alliance will take into account the person's accessibility needs when customizing individual requests.

## **3. Accessible Websites and Web Content**

Departments governed by Vibrant Healthcare Alliance will make their web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level A. Web content includes any information which resides on an internet or intranet web site.

## **4. Emergency Procedures, Plans or Public Safety Information**

When Vibrant Healthcare Alliance prepares public emergency procedures, plans or public safety information, it is responsible for providing the information in an accessible format or with appropriate communication supports as soon as practicable, upon request.

## **5. Exceptions**

- a) The Information and Communications Standard does not apply to products and product labels; unconvertible information or communications; or information that Vibrant Healthcare Alliance does not control directly or indirectly through a contractual relationship. If Vibrant Healthcare Alliance determines that information or communications are unconvertible, it will provide the person requesting information or communication with the following (Information is regarding as unconvertible if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available).
- b) An explanation as to why the information or communications are unconvertible.
- c) A summary of the unconvertible information or communications;

## **6. Feedback Process**

Vibrant Healthcare Alliance has a process in place for receiving and responding to feedback. Vibrant Healthcare Alliance shall notify the public about the availability of these accessible formats and upon request, must ensure this process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports. Vibrant Healthcare Alliance will solicit feedback from the public on the accessibility of the feedback process itself.



**Procedures:**

If you have any questions or concerns about this policy or its related procedures please contact:

HR Coordinator

(416) 486-8666 ext. 262

2398 Yonge Street

Toronto, ON M4P 2H4

Email: [accessibility@vibranthealthcare.ca](mailto:accessibility@vibranthealthcare.ca)

This policy and its related procedures will be reviewed as required in the event of legislative changes.