

# Vibrant Healthcare Alliance 2019-2023 Multi Year Accessibility Plan

Reviewed and Approved: December 18, 2019



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#### INTRODUCTION

The mission of Vibrant Healthcare Alliance is building healthier communities using integrated services to empower individuals living with complex issues. Vibrant Healthcare Alliance's vision is empowering independence, health and well-being together. We are committed to our values of inclusiveness, accountability, excellence and collaboration.

Vibrant Healthcare Alliance complies with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and is committed to ensuring that programs and services are fully accessible to people with physical disabilities. The core principles of the Act – independence, dignity, integration and equality of opportunity for people with disabilities – are aligned with inclusiveness, one of the core values that supports Vibrant Healthcare Alliance to achieve its mission. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by removing barriers and meeting AODA accessibility requirements.

This five-year accessibility plan builds on the work of Vibrant Healthcare Alliance's legacy organizations: The Anne Johnston Health Station and Tobias House Attendant Care Inc. It is a living document that outlines our goals from 2019-2023. It will be reviewed on an annual basis and in 2023, Vibrant Healthcare Alliance will release a new multi-year accessibility plan.

In 2019, Vibrant Healthcare Alliance developed its first version of organizational policies, which include the following:

- Accessible Customer Service Policy
- Information and Communication Policy

This five-year plan was created to comply with Section 4 of the Integrated Accessibility Standards Regulation, which requires non-profit organizations like Vibrant Healthcare Alliance to establish, implement, maintain and document a multi-year accessibility plan. Vibrant Healthcare Alliance developed this plan in consultation with our Barrier Free Consumer Advisory Committee.

Vibrant Healthcare Alliance is required to file Accessibility Compliance Reports on December 31, 2020 and December 31, 2023.



# **SECTION ONE: STRATEGIES AND ACTIONS**

#### Customer Service

Vibrant Healthcare Alliance is committed to providing accessible customer service to people with disabilities. This means that we will continue to provide services to people with disabilities with the same high quality and timeliness as others.

Vibrant Healthcare Alliance will ensure compliance with the Accessibility Standards for Customer Service Regulation through implementation of the following:

- Vibrant will provide new employees and volunteers with accessible customer service training. Refresh training will be available for existing employees and volunteers.
- Vibrant will ensure that agents and contractors hired to interact with the public on our behalf provide evidence that they have received the required accessible customer service training.
- Vibrant will gather feedback on the programs and services it provides and will act on that feedback to improve services to people with disabilities.
- Vibrant will post appropriate notices regarding service disruptions.
- Vibrant will review and amend its Customer Service Standards Policy on an annual basis and more frequently, as required.
- Vibrant will ensure that any new policies that are created regarding customer service are consistent with the principles of dignity, independence, integration and equal opportunity.
- Vibrant will welcome people with disabilities who use assistive devices, support people or service animals and will train the appropriate staff on assistive devices at our site locations.



# Information and Communications

Vibrant Healthcare Alliance is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs and have the following in place:

- Communication supports such as plain language, sign language, reading aloud, or using written notes to communicate will be made available to our clients.
- Vibrant Healthcare Alliance will work with a website developer to ensure all content and functionality conforms to WCAG 2.0, Level AA by January 1, 2021.

#### Feedback

All of Vibrant Healthcare Alliance's feedback processes shall be accessible to persons with disabilities. Vibrant Healthcare Alliance will continue to notify the public about the availability of accessible formats and communication supports.

- Information about the feedback process will be readily available to clients and the public via Vibrant Healthcare Alliance's website and will include information about what actions are required to be taken after feedback or a complaint is received.
- Feedback regarding the way Vibrant Healthcare Alliance provides goods and services to people with disabilities can be made in person, by telephone, through email, or by other means as required.

# Submitting Feedback

Individuals can submit feedback via the following methods:

- By mail to the Chief Executive Officer at 2398 Yonge Street, Toronto ON M4P 2H4
- By phone: (416) 486-8666 ext. 262
- By email: accessibility@vibranthealthcare.ca
- Alternate formats will continue to be available on request for all feedback forms/mechanisms

Individuals who wish to provide feedback by completing an onsite client feedback form or verbally can do so with any Vibrant Healthcare Alliance employee. Individuals who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted



#### **EMPLOYMENT**

Vibrant Healthcare Alliance is committed to fair and accessible employment practices.

#### Recruitment

- Vibrant will notify its employees and the public about the availability of accommodations
  for applicants with disabilities in its job postings by including the following statement in all
  job postings: Vibrant Healthcare Alliance is an equal opportunity employer. If you require
  accommodation to participate in the hiring process, please contact
  hr@vibranthealthcare.ca.
- Vibrant will notify successful applicants of its policies for accommodating employees with disabilities when offering employment. This notice is included in the letter of offer to the successful applicant.

# Informing Employees with Disabilities of Supports Available to Them

- Vibrant will inform all employees of its policies for supporting employees with disabilities, including providing employment-related accommodations. Information will be provided through staff memos, email and staff meetings.
- New employees will receive this information during the orientation process.
- All employees will be given updated information whenever there is a change to existing policies on the provision of job accommodations.
- Employees will be assured that their privacy is respected and that any sharing of information about their accommodation needs will be shared on an as-needed basis with their consent.
- Vibrant will consult with employees with disabilities to provide them with the accessible formats and communication supports they require to do their jobs effectively.



#### Individual Accommodation Plans

Vibrant Healthcare Alliance is committed to supporting employees with disabilities:

- An employee who has requested accommodation will be provided with the necessary supports.
- Vibrant will develop and put into place a process for developing individual accommodation plans and return to work policies for employees that have been absent due to a disability. Please see Individual Accommodation Plan Policy for more information.
- All accommodation plans are confidential. Each plan will include information on accessible formats and communication supports required, individual emergency response requirements and any other accommodation required.

#### Return to Work

- Vibrant has a Return to Work process in place. Throughout the process, the HR Coordinator works with the employee, his or her supervisor and the group insurance benefits coordinators.
- Vibrant will ensure that supervisors understand the accommodation being made as well as the privacy/communication concerns and agreements around return to work requirements.
- Vibrant will formally document the return-to-work accommodation process.

# Performance Management and Career Development

• Vibrant Healthcare Alliance will take steps to ensure the accessibility needs of employees with disabilities are taken into account if Vibrant Healthcare Alliance is using performance management, career development and redeployment processes.



# Workplace Emergency Response

- Vibrant will ensure that new employees are provided with workplace emergency information in accessible formats as necessary, that an emergency accommodation plan is prepared for them, when needed, and that emergency accommodation plans for existing employees are reviewed and revised as required.
- Vibrant will ensure that employees requiring assistance during an emergency are knowledgeable of their own individualized emergency response plans. New employees with accommodation needs will develop individual emergency plans in collaboration with the HR Coordinator. Revisions will be made to the plans for existing employees should their accommodation needs change.

#### **TRAINING**

Vibrant Healthcare Alliance is committed to training staff and volunteers in Ontario's accessibility laws and the Ontario Human Rights Code as it applies to people with disabilities.

Vibrant will ensure that training is provided in compliance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), as outlined in the Regulations under the AODA.

Training will be provided to:

- All new employees and volunteers;
- All persons who participate in developing Vibrant Healthcare Alliance's policies; and
- All third-party contractors who provide services or facilities on behalf of Vibrant Healthcare Alliance (e.g. suppliers and consultants).

In 2019 – 2020, a refresher training will be provided that will be appropriate to the duties of employees, volunteers and other persons as identified above.

Training will be provided as soon as practicable to employees, volunteers and other persons.

Where there are changes to the Information and Communication Policy, training will be provided with regards to those changes. Vibrant Healthcare Alliance will maintain a record of the dates of when training is provided and the number of individuals to whom it was provided.



# **DESIGN OF PUBLIC SPACES**

Vibrant Healthcare Alliance will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications of public spaces.

Public spaces include:

- Accessible off-street parking
- Service-related elements like service counters, waiting areas, doors, etc.

Vibrant Healthcare Alliance will put the following procedures in place to prevent service disruptions to the accessible parts of its public spaces:

• In the event of a service disruption, we will notify the public of the service disruption and alternatives available. Notifications will be posted to the Vibrant Healthcare Alliance website and telephone line: (416) 486-8666. Signage will also be posted at the affected site location(s).

#### **PROCUREMENT**

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.

#### For more information:

For more information on this accessibility plan, please contact:

Lyndsay Tchegus-Veiga, Director, Strategy and Corporate Services

Phone: (416) 486-8666 ext. 229

Email: lyndsayt@vibranthealthcare.ca

Accessible formats of this document are available free upon request from the front desk at Vibrant Healthcare Alliance, 2398 Yonge Street.



#### **APPENDICES**

# **Appendix 1: Vibrant Healthcare Alliance Accessible Customer Service Policy**

Date Approved: March 2019

**Date Reviewed:** February 2019 and December 2019

**Approved by:** Board of Directors

**Applicability:** Board of Directors, staff, students, volunteers and contractors

#### **Policy Statement:**

Vibrant Healthcare Alliance recognizes the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* and the *Integrated Accessibility Standards, Ontario Regulation 191/11* under the *Accessibility for Ontarians with Disabilities Act, 2005*. Vibrant Healthcare Alliance shall use reasonable efforts to provide people with disabilities integrated and equitable services in a manner that respects their dignity and independence.

All goods and services provided Vibrant Healthcare Alliance shall follow the principles of dignity, independence, integration and equal opportunity.

# Scope:

This policy applies to the following:

- a) The provision of goods and services at the premises owned and operated by the Vibrant Healthcare Alliance.
- b) All staff, volunteers, students, agents and/or contractors who deal with clients or other third parties that act on behalf of Vibrant Healthcare Alliance, including when the provision of goods or services occurs off the premises of Vibrant Healthcare Alliance (i.e. home visits).
- c) All persons who participate in the development of Vibrant Healthcare Alliance policies, practices and procedures governing the provision of goods and services to members of the public or third parties.



# **Definitions:**

Assistive Device – is 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 clients 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.

**Customer** – refers to clients, participants, staff and community members

**Disability** – the term disability as defined by the <u>Accessibility for Ontarians with Disabilities Act,</u> 2005, and the <u>Ontario Human Rights Code</u>, 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 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*.

Guide Dog – means a guide dog as defined in section 1 of the Blind Persons' Rights Act, 1990.



**Service Animal** – is defined per the Accessibility Standards for Customer Service as follows:

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

**Support Person** – is defined per the Accessibility Standards for Customer service as follows: 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.

#### **Procedures:**

This policy addresses the following:

- 1. The Provision of Goods and Services to Persons with Disabilities
- 2. The Use of Assistive Devices
- 3. The Use of Guide Dogs and/or Service Animals
- 4. The Use of Support Persons
- 5. Notice of Service Disruptions
- 6. Customer Feedback
- 7. Training
- 8. Notice of Availability and Format of Required Documents

#### 1. The Provision of Goods and Services to Persons with Disabilities

Vibrant Healthcare Alliance will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing programs and services as long as this does not present a safety risk;



- using alternative methods when possible to ensure that customers with disabilities have access to integrated programs and services;
- taking into account individual needs when providing programs and services; and
- communicating in a manner that takes into account the customer's disability.

#### 2. The Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing programs or services provided by Vibrant Healthcare Alliance. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of programs and services.

Vibrant Healthcare Alliance will ensure that the appropriate staff know how to use any assistive devices made available on the premises for clients (i.e. automatic door openers, transfer lifts, etc.).

Staff should not operate or otherwise interfere with a client's personal assistive device, unless invited to do so by the user or their support person (when direct communication is not possible.)

#### 3. The Use of Guide Dogs and Service Animals

A customer with a disability that is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals.

#### **Exclusion Guidelines**

If a guide dog or service animal is excluded by law, Vibrant Healthcare Alliance will offer alternative methods to enable the person with a disability to access goods and services, whenever possible (i.e. securing the animal in a safe location and offering the guidance of an employee).

## **Applicable Laws**

The Health Protection and Promotion Act, Ontario Regulation 493/17, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served,



displayed, stored, sold or offered for sale. It does allow service animals described in subsection 80.45 (4) of Ontario Regulation 191/11 (Integrated Accessibility Standards) made under the *Accessibility for Ontarians with Disabilities Act, 2005* to go into places where food is served, sold or offered for sale.

# Recognizing a Guide Dog and/or Service Animal

If it is not readily apparent that the animal is a service animal, a person with a disability may be asked to provide proof. Vibrant Healthcare Alliance may request verification from the customer.

#### Verification may include:

- a letter from a physician, nurse, psychologist, psychotherapist, audiologist, chiropractor or optometrist, confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Ontario; or,
- a certificate of training from a recognized guide dog or service animal training school.

#### Care and Control of the Animal

The customer that is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

#### **Allergies**

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, Vibrant Healthcare Alliance will make all reasonable efforts to meet the needs of all individuals.

## 4. The Use of Support Persons

Any person with a disability who is accompanied by a support person must be allowed to enter Vibrant Healthcare Alliance with his or her support person in areas where the public or third parties are permitted and/or served. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on the premises.



In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation.

# 5. Notice of Service Disruptions

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Vibrant Healthcare Alliance. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Vibrant Healthcare Alliance programs or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the event of unplanned temporary disruptions, advance notice may not be possible.

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- programs or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

When disruptions occur, Vibrant Healthcare Alliance will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and at the nearest entrance to the service disruption and/or on Vibrant Healthcare Alliance website
- contacting clients with appointments or those who regularly attend a planned activity
- verbally notifying clients when they are making an appointment; or
- by any other method that may be reasonable under the circumstances.

#### 6. Feedback Process

Vibrant Healthcare Alliance shall provide clients with the opportunity to provide feedback on the programs and services provided to clients with disabilities. Information about the feedback process will be readily available to clients and the public and will include information about



what actions are required to be taken after feedback or a complaint is received. Feedback regarding the way Vibrant Healthcare Alliance provides goods and services to people with disabilities can be made in person, by telephone, through email, or by other means as required.

Feedback forms, along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email) will be available upon request.

#### **Submitting Feedback**

Clients can submit feedback to:

Chief Executive Officer Vibrant Healthcare Alliance 2398 Yonge Street Toronto, ON M4P 2H4

By phone: (416) 486-8666 ext. 262

By email: <u>accessibility@vibranthealthcare.ca</u>

Clients who wish to provide feedback by completing an onsite client feedback form or verbally can do so with any Vibrant Healthcare Alliance employee. Clients who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

#### 7. Training

In accordance with the regulation, training in accessible customer service must be provided to:

- All staff, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Vibrant Healthcare Alliance (i.e. consultants who provide training or workshops to clients).
- Those who are involved in the development and approval of customer service policies, practices and procedures.



## **Training Provisions**

Regardless of the format, Accessibility Standards for Customer Service training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Accessibility Standards for Customer Service.
- Instructions on how to interact with persons with various types of disabilities.
- Instructions on how to interact with people with disabilities who use assistive devices, requires the assistance of a guide dog or other service animal or require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing Vibrant Healthcare Alliance programs and services.
- Information on the policies, procedures and practices that govern the provision of goods and services.

# **Training Schedule**

Vibrant Healthcare Alliance will provide training as soon as practicable. Training will be provided to new staff, volunteers, agents and/or contractors regardless of their interaction with the public or who or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and or practices.

# **Record of Training**

Vibrant Healthcare Alliance will keep a record of training that includes the person's name, training dates and the training completed.



# 8. Notice of Availability and Format of Required Documents

Vibrant Healthcare Alliance shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Vibrant Healthcare Alliance, the organization's website and/or any other reasonable method.

# **Related Policies:**

• Information and Communication Policy (AODA)



# **Appendix 2: Vibrant Healthcare Alliance Information and Communication Policy**

Date Approved: March 2019
Date Reviewed: February 2019
Approved by: Board of Directors

**Applicability:** Board of Directors, staff, students, volunteers and contractors

# **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 regarded 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

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