

Accessibility Policy

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Policy Owner: Chief Executive Officer

This policy has been reviewed and approved by the Chief Compliance Officer and will be sent to the Board of Directors of eHealth Ontario for approval.

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1 Introduction, Purpose and Objectives

1.1 Introduction

- 1.1.1 eHealth Ontario supports the full inclusion of persons with disabilities in its workplace and the provision of its services, as is spelled out clearly in the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code, the Ontarians with Disabilities Act (ODA), 2001 and the Accessibility for Ontarians with Disabilities Act (AODA), 2005.
- 1.1.2 eHealth Ontario is committed to ensuring equal access and participation for people with disabilities, and to treating people with disabilities in a way that allows them to maintain their dignity and independence.
- 1.1.3 eHealth Ontario believes in full integration, and is committed to meeting the needs of people with disabilities in a timely manner. This is achieved by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility legislation.

1.2 Purpose

- 1.2.1 The purpose of this policy is to ensure that whether a person's disability is apparent or not, all are treated with courtesy; are made to feel welcome; and have their need for accommodation respected.

1.3 Objectives

- 1.3.1 This policy governs the establishment of a workplace in a manner that respects the dignity and independence of persons with disabilities.
- 1.3.2 This policy governs the provision of services by eHealth Ontario in a manner that respects the dignity and independence of persons with disabilities.
- 1.3.3 This policy seeks to ensure that a person with a disability is treated in the same manner and timeliness that others do.

1.4 Terminology

- 1.4.1 Policies follow certain wording conventions respecting the degree to which they are mandatory, permissive or optional. There are precise requirements and obligations associated with the following terms:

Shall/Must: This requirement is not optional

Should: The implementer *must* choose this action, *unless* business functionality dictates otherwise. Exceptions *must* be approved by management, as modifications to the standard practice.

May: The implementer *may* choose to take one or more of a selection of options, but *must* make a choice of one or more, as dictated within the context of the item

- 1.4.2 Pronouns and any variations thereof will be deemed to include the feminine and masculine and all terms used in the singular will be deemed to include the plural, and vice versa, as the context may require.
- 1.4.3 The words “include” and “including” when used are not intended to be exclusive and mean, respectively, “include, without limitation,” and “including, but not limited to”.

1.5 Definitions

- 1.5.1 In this policy, the following meaning shall be used:

Disability

Disability includes

- (1) Any degree of physical disability, infirmity, malformation or disfigurement;
- (2) A condition of mental impairment or a developmental disability;
- (3) A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (4) A mental disorder; and
- (5) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & 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.

2 Scope and Compliance

2.1 Scope

- 2.1.1 This policy sets the minimum requirements for the establishment of a workplace and for the provision of services by eHealth Ontario in a manner that respects the dignity and independence of persons with disabilities.
- 2.1.2 This policy shall apply to all eHealth Ontario personnel.

2.2 Compliance

- 2.2.1 The Chief Compliance Officer is responsible for ensuring compliance with the requirements of this policy.
- 2.2.2 There shall be no deviation or exemption from the requirements of this policy.
- 2.2.3 The Chief Compliance Officer shall present periodic reports on any incidents of non-compliance with the requirements of this policy to the Compliance Oversight Committee.

3 Requirements

3.1 General

- 3.1.1 eHealth Ontario personnel shall be aware of the provisions of the Ontario Human Rights Code, the Ontarians with Disabilities Act (ODA), 2001 and the Accessibility for Ontarians with Disabilities Act (AODA), 2005 that are applicable to the organisation and the services it provides.
- 3.1.2 On an annual basis, eHealth Ontario personnel shall be trained on the applicable provisions of the Ontario Human Rights Code, the ODA, and the AODA and requirements of the Integrated Accessibility Standards Regulation.

3.2 Communication

- 3.2.1 eHealth Ontario and its personnel shall communicate with people with disabilities in ways that take into account their disability.

3.3 Procurement

- 3.3.1 When procuring goods or a service, eHealth Ontario shall ensure that appropriate consideration is given to accessibility criteria and features.

3.4 Information and Communications

- 3.4.1 eHealth Ontario shall communicate with people with disabilities in ways that take into account their disability.
- 3.4.2 When requested, information about our office and its services, including public safety information, shall be supplied in accessible formats or with communication supports.
- 3.4.3 The eHealth Ontario website shall meet the requirements of internationally-recognized standards.

3.5 Employment

- 3.5.1 Employees, potential hires and the public shall be informed that accommodations can be made during recruitment and hiring.
- 3.5.2 Personnel shall be notified that supports are available for those with disabilities.
- 3.5.3 A process to develop individual accommodation plans for employees shall be established and implemented.
- 3.5.4 Where necessary, customized emergency information to help an employee with a disability during an emergency shall be developed and communicated.
- 3.5.5 The performance management, career development and redeployment processes shall take into account the accessibility needs of all employees.

4 Approval and Administration

4.1 Approval

- 4.1.1 This policy is issued under the authority of the Board of Directors.
- 4.1.2 This policy is effective on the date of its final approval.
- 4.1.3 Enforcement of this policy shall begin on the date of its final approval

4.2 Administration

- 4.2.1 The Chief Executive Officer is accountable for this policy.
- 4.2.2 The Chief Compliance Officer shall be responsible for administering, interpreting and ensuring compliance with this policy.

4.3 Continuous Improvement Cycle

- 4.3.1 The Chief Compliance Officer shall review this policy at least every twelve (12) months to ensure the continued viability of this policy, and to oversee any necessary amendment(s) of this policy as a result of this review.

4.4 Publication and Notification

- 4.4.1 A copy of this policy and related documentation are available in electronic format at <http://inside.ehealthontario.on.ca/policy/default.aspx>.
- 4.4.2 Notification of substantive changes or modifications to this policy shall be communicated to all personnel.
- 4.4.3 Personnel should periodically check the eHealth Ontario's website for notice of modifications to this policy and associated processes and guidelines.

4.5 Interpretation

- 4.5.1 Each provision of this policy and any relevant agreement pursuant to it will be interpreted in such manner as to be effective and valid under applicable laws of Ontario and Canada, including, but not limited to:
 - (1) *Accessibility for Ontarians with Disabilities Act, 2001*
 - (2) Ontario Regulation 43/02 amended to O. Reg. 339/08 made under the *Development Corporations Act*;
 - (3) *Personal Health Information and Protection Act* and Ontario Regulation 329/04; and
 - (4) *Freedom of Information and Protection of Privacy Act, 2004*.
- 4.5.2 This policy will be interpreted in accordance with other eHealth Ontario policies including the *Privacy and Data Protection Policy* and the *Information Security Policy*.

- 4.5.3 The failure of eHealth Ontario to enforce at any time any of the provisions of this policy, and related agreements or the failure to require at any time performance by any other party of any of the provisions of this policy, and related agreements will in no way be construed to be a present or future waiver of such provisions, nor in any way affect the ability of eHealth Ontario to enforce each and every such provision thereafter. The express waiver by eHealth Ontario of any provision, condition, or requirement of this policy, and related agreements will not constitute a waiver of any future obligation to comply with such provision, condition, or requirement.

4.6 Organizational References

- 4.6.1 Where this policy refers to any organizational body (division, committee, etc.) or position, the reference shall be interpreted to reference the successor body or position in the event of any organizational change.

Appendix A: Associated Documents

The following documents are associated with this policy and may be consulted for additional detail or policy interpretation.

Document	Location
Ontario Regulation 43/02 made under the <i>Development Corporations Act</i>	http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_020043_e.htm
<i>Freedom of Information and Protection of Privacy Act.</i>	http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90f31_e.htm
<i>Personal Health Information Protection Act, 2004</i>	http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_04p03_e.htm
Ontario Regulation 329/04 made under the <i>Personal Health Information Protection Act, 2004</i>	http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_040329_e.htm
<i>Ontarians with Disabilities Act, 2001</i>	http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_01o32_e.htm