

Saint Luke's Place

Multi-Year Accessibility Plan

2021-2026



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1. Background: Accessibility and the Province of Ontario

There are currently two active pieces of legislation in Ontario that specifically address accessibility: The Ontarians with Disabilities Act, 2001 (ODA) and the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

The purpose of the ODA is to improve the quality of life and experiences of persons with disabilities by identifying, preventing, and removing any barriers that may limit opportunities for individuals with disabilities to fully participate in society.

The AODA advances the goals of the ODA by requiring public, private and non-profit organizations to identify, remove, and prevent barriers to accessibility in order to make the Province of Ontario fully accessible for all persons with disabilities by 2025. Through the AODA and the Integrated Accessibility Standard Regulation (IASR) (Ontario Regulation 191/11), the Government of Ontario has identified key areas for the development of common accessibility standards that are intended to ensure all sectors and organizations can provide fully accessible services and environments for Ontarians. The goal of these standards is to facilitate the full participation of persons with disabilities in society.

Key areas identified under the AODA are:

- Customer Service
- Information and Communication
- Employment, Transportation
- Design of Public Spaces

2. Commitment of Accessibility

In support of Saint Luke's Place mission to be a centre of excellence, we are committed to providing our employees, residents, and clients with barrier-free access to our goods and services, communication and information, and employment opportunities in compliance with the Accessibility for Ontarians with Disability Act (AODA).

We want to provide excellent public service for all Ontarians. We want to reflect the public we serve in everything we do, and we want to attract the talented people we need to fill jobs. Building a dynamic and accessible organization will help us reach these goals.

Saint Luke's is committed to:

- Transforming our culture to include accessibility into our everyday practice

- Commitment to the principles of independence, dignity, integration, and equality of opportunity to meet the needs of people with disabilities
- Establishing, maintaining, and implementing policies, associated practices, and procedures to meet the accessibility needs of people in a timely manner
- Excellence in serving all our clients including people with disabilities in a manner that considers the person's disability.
- Promoting values that support relationships between people with disabilities and the organization.
- Training all employees and volunteers who provide goods and services to our clients, and persons participating in the development and approval of Saint Luke's Place policies, practices, and procedures on the requirements under the Integrated Regulation and the Ontario Human Rights Code as it pertains to persons with disabilities
- Providing people with disabilities the same opportunity of access to employment opportunities and related services as do all prospective employees.

3. Accessibility Plan

Since 2004 all municipalities in the Province have had a legal obligation under the ODA to prepare annual accessibility plans. Under the AODA, accessibility planning requirements shift from annual to multi-year plans which must outline an organization's strategy to prevent and remove barriers and meet the requirements under the Integrated Accessibility Standard Regulation (IASR).

This plan describes:

- The measures that Saint Luke's Place has taken over previous years to remove barriers to people with disabilities
- The process by which Saint Luke's Place is identifying, removing, and preventing barriers to people with disabilities
- The continuing and new actions of Saint Luke's Place will take during the coming year to remove barriers to people with disabilities
- The communication plan of this accessibility plan

4. Accessibility Committee

An accessibility workgroup/ committee will be established to develop and monitor an annual accessibility plan. The workgroup will report semi-annually to the leadership team in June and December of each year.

Saint Luke's Place has established an Accessibility Committee which will provide Leadership to the organization in its ongoing commitment to be barrier free

The workgroups consist of managers from each area including:

- Nursing
- Maintenance
- Environmental
- Recreation
- Human Resources
- Foodservice
- Chief Executive Office and/or Administrator

In addition, issues identified during compliance surveys and each year when the Resident/Family Satisfaction Surveys are tabulated, any accessibility issues identified will be referred to the Chief Executive Officer and/or Long-Term Care Administrator.

The Resident Council, Family Council, or any employee group or committee is welcome throughout the year to refer issues for consideration to the Chief Executive Officer and/or Long-Term Care Administrator in helping foster a community approach to accessibility and inclusion involves the review of policies, programs and services and identification, removal and prevention of barriers faced by persons with disabilities.

Chief Executive Officer and/or Long-Term Care Administrator will provide a report each December to the Board of Directors identifying the areas it has addressed during the previous year.

5. Regulatory Requirements and Proposed and Completed Actions

Saint Luke's Place continues to develop and implement accessibility initiatives under the ODA and meeting compliance dates for accessibility requirements within the Integrated Accessibility Standard Regulation (IASR) under the AODA.

A) Customer Service

Saint Luke's Place is committed to ensuring that all staff and customers, whatever their ability, work in an accommodating environment and receive accessible goods and services in a timely manner.

We will achieve this by:

- Reviewing and updating policies regularly to ensure high quality, accessible customer service
- Embedding accessibility requirements into staff training and orientation materials
- Reviewing customer feedback and taking appropriate action

Our accomplishments:

- Saint Luke's Place mission is to support appropriate services to enable seniors of different backgrounds and needs to live their lives to the fullest – in the healthiest, most independent, and dignified ways. This is aligned with the AODA objective.
- Continue to provide training and reinforcement of practices which abide by the Human Rights Code to all our staff, volunteers, and service providers.

B) General

General requirements under the IASR are those regulatory requirements that apply across all three (3) standards in this regulation- Information and Communication, Employment and Transportation.

Saint Luke's Place will achieve this by:

- Developing a multi-year accessibility plan outlining strategies to prevent and remove barriers to accessibility and reviewing the plan once every five (5) years
- Continue to incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities
- Continue to train employees, volunteers, all those who participate in developing policies, and all others who provide goods or services on behalf of Saint Luke's Place, about the requirements in the Integrated Accessibility Standards Regulation, as well as the Human Rights Code as it relates to people with disabilities

Our accomplishments:

- Saint Luke's Place has established an Accessibility Committee which will provide Leadership to the organization in its ongoing commitment to be barrier free.
- Developed a multi-year plan for 2021-2026 in consultation with the committee and Board of Directors, staff, and those we serve
- IASR policy Policies and guidelines specifically related to accessibility have been established and we are continuing to review our other policies and practices to incorporate accessibility.
- Staff and volunteers are trained on how to provide service to our residents and clients with disabilities, educated to the IASR/ Customer Service Policies and

Human Rights Code

- A review has been conducted to identify areas that Saint Luke's Place can focus on in the long run and an annual Accessibility Plan has been created to identify areas for action and expected timeline for completion (reference: Accessibility Plan). The Board of Directors is kept apprised of the status of the annual Accessibility Plan.

C) Information and Communication

Information and communication are a large part of Saint Luke's Place daily business. It is because of this that it is so important to ensure that information and communications are created in a way that considers accessibility.

Saint Luke's Place will follow best practices when developing, implementing, and maintaining information and communication strategies and products. This includes websites, intranet sites, print communications materials as well as face-to-face interactions.

Saint Luke's Place is committed to ensuring that information and communications are available and accessible to people with disabilities.

We will achieve this by:

- Ensuring that emergency information, procedures, plans and public safety information that is available to the public is available in alternate formats, when requested
- Developing guidelines and best practices for creating accessible documents for common desktop applications such as MS Word, Excel, and PowerPoint
- Notifying the public about the availability of accessible formats and communication supports
- Web Content Accessibility Guidelines (WCAG) Level 2.2 AA Compliance (2021)
- Working towards ensuring web content published on the Saint Luke's Place website is in an accessible format whenever possible
- Providing access to or arranging for the provision of access to accessible library material where they exist
- Informing the public about the availability of accessible library material and providing information in an accessible format or with appropriate communication supports, upon request

Our accomplishments:

Saint Luke's Place incorporates various communication tools in our daily practice of care to our residents and clients.

This includes:

- Written handbooks or brochures for our residents and clients and staff being available to respond to inquiries

- Saint Luke's Place website is monitored by a 3rd party contractor to ensure Web Content Accessibility Guidelines (WCAG) compliance
- Embedding accessibility requirements into staff training and orientation materials
- Appropriate activities specific to our residents' and clients' cognitive and physical ability
- Acceptance of various channels of feedback including group (via Residents' Council and Family Council) and/or one-to-one meetings, written feedback, and comment cards
- Appropriate use of visuals
- Regular face to face meetings with our residents, clients, and staff. Minutes are available to the relevant parties for review and comment

D) Employment

Saint Luke's Place is committed to ensuring that the process of finding, getting, and retaining a job at the Home is as inclusive as possible to build an effective workforce. Saint Luke's Place will be an employer of choice that enables and encourages people with disabilities to have the same opportunity of access to employment opportunities and related services and participate fully in all aspects of the organization.

Saint Luke's Place will achieve this by:

- Reviewing on an ongoing basis, Human Resources policies, practices, and procedures to ensure accessibility to persons with disabilities throughout the employment process, including recruitment, retention, career development and return-to-work.
- Notifying job applicants who have been invited to participate in recruitment, assessment, or the selection process that, where needed, accommodations for disabilities are available, on request, to support their participation in the process
- Notifying successful applicants of Saint Luke's Place policies for accommodating employees with disabilities when offering employment
- Informing new and existing employees of Saint Luke's Place policies for supporting employees with disabilities, including providing employment related accommodations for disabilities
- Consulting with employees who have disabilities to provide them with the accessible formats and communications supports they require to do their jobs effectively and to be informed of information that is generally available to all employees in the workplace
- Have in place a documented process for supporting employees who return to work after being away for reasons related to their disabilities
- Consider the accessibility needs of employees with disabilities during the performance management process (annual performance reviews)
- When providing career development and advancement opportunities the leadership team will consider the accessibility needs of their employees who have disabilities
- Redeployment process will consider the accessible needs of employees with disabilities when moving them to other positions, so that employees can

continue to have their accommodation needs met

Our accomplishments:

Saint Luke's Place is committed to ensuring that people with disabilities have the same opportunity of access to employment opportunities and related services

- Employment policies and practices are established, implemented, and reviewed regularly to ensure all individuals are treated based on merit without discrimination.
- Reasonable accommodations will be made for individuals with disabilities when requested, in a reasonable and timely manner, considering the individual's needs. Accommodations are regularly reviewed and adjusted, as necessary
- Saint Luke's Place job postings, and employment offer letters include the following statement regarding accommodations:
"Saint Luke's Place is an equal opportunity employer and will accommodate the needs of qualified applicants under AODA legislation. Should accommodation be required, please notify the Director of Human Resources or the Long Term Care Administrator."

E) Transportation

Saint Luke's Place does not have specific requirements under the Transportation section and does not offer conventional, specialized, or public transportation services.

6. Design of Public Spaces

Saint Luke's Place will meet the Accessibility Standards for the Design of Public Spaces (Ontario Regulation 191/11), as applicable, when building new or making major modifications to public spaces.

Public Spaces include:

- Recreation Trails
- Beach Access Routes
- Outdoor Public Eating Areas
- Outdoor Play Spaces (playgrounds)
- Outdoor Paths of Travel; (sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals)
- Accessible Off-Street Parking
- Service-related elements (service counters, fixed queuing lines and waiting areas)

A) Recreation Trails

Saint Luke's Place does not have recreation trails on the premises, therefore are not regulated under the standard.

B) Beach Access Routes

Saint Luke's Place does have beach access on the premises, therefore are not regulated under the standard.

C) Outdoor Public Eating Areas

Saint Luke's Place does not have outdoor public eating areas, therefore are not regulated under the standard.

D) Outdoor Play Spaces

Saint Luke's Place does not have outdoor play spaces, therefore are not regulated under the standard.

E) Outdoor Paths of Travel

This part pertains to the exterior paths of travel that Saint Luke's Place intends to maintain that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience.

Saint Luke's Place will achieve this by:

- Adhering to certain technical requirements
- Meeting certain requirements if the path of travel is equipped with a ramp
- Meeting certain requirements if the stairs connect to exterior paths of travel
- Meeting certain requirements where a curb ramp is provided on an exterior path of travel, the curb ramp must align with the direction of travel
- Meeting certain requirements where a depressed curb is provided on an exterior path of travel
- Consulting with the public, persons with disabilities, Board of Directors and the Accessibility Committee on the design and placement of rest areas along the exterior path of travel

Our accomplishments:

- In many ways, Saint Luke's Place has already recognized that a barrier free organization is a stronger organization through our various achievements. Saint Luke's Place had made a conscious effort in its architectural design to meet and exceed building standards when it comes to ensuring the safety and meeting accessibility for our staff, clients, residents, and visitors.
- Weather protection is provided at the Administration Entrance and routes of travel are wide enough to accommodate mobility devices and lift equipped vans.
- Curb cuts at drives, parking, and drop-off locations, with adequate number of

accessible parking spaces clearly marked with the International Symbol of Accessibility.

- Landscaping is maintained and well-trimmed to ensure routes of travel are clear and well lit.
- Lighting throughout the campus parking lots, and walkways to ensure areas are well illuminated for safety
- Our doors are operational with a closed fist and the closers are timed to allow sufficient time for movement between areas. Clear, visible signage and lighting are provided, and our emergency systems are checked and maintained on a regular basis. Service desks and service facilities are suitable for both standing and seating users.
- All our public elevators have door jams at each door identifying the floor in raised Braille letters and open public spaces are flexible in design to allow for wheelchair.

F) Accessible Parking

Off-Street Parking

Meeting certain requirements when constructing new or redeveloping off-street parking facilities, as stated in the Regulation, that Saint Luke's intends to maintain.

The following tables outlines locations and number of parking spaces

Location	Regular Parking Spaces	Accessible Parking Spaces
Administration Lot A & C	67	1
Saint Luke's Place Church Lot (right side only)	54	0
E Wing Lot	47	2
D Wing Lot	58	1

Saint Luke's Place will achieve this by:

- Providing accessible parking spaces for the use of persons with disabilities. Wider spaces to accommodate mobility aid and standard width spaces to accommodate mobility devices such as canes or crutches
- Providing a minimum number and type of accessible parking spaces
- Ensuring that parking spaces for the use of persons with disabilities are distinctly indicated by erecting an accessibly permit parking sign

On-Street Parking

When constructing or redeveloping existing on-street parking spaces, Saint Luke's Place shall consult the need, location, and design of accessible on-street parking spaces by consulting with the public, persons with disabilities and the Home's Accessibility Committee.

Consultation topics could include:

- Expected accessibility benefits
- Any relevant concerns
- Local traffic patterns

G) Obtaining Services

Saint Luke's Place strives to provide welcoming environments for all members of the public to visit and/or conduct business at the Home. To ensure the public spaces and service areas used by the public are accessible, Saint Luke's Place will ensure all new or redeveloped service counters, fixed queuing guides (where people line up for service) and waiting areas accommodate mobility aids.

Where technical specifications are indicated in Ontario Regulation 191/11, Saint Luke's Place will make every effort to ensure compliance with the technical requirements set out in the Regulation.

H) Maintenance

As required under the Design of Public Spaces Standard, Saint Luke's Place has developed procedures with preventative and emergency maintenance of accessible elements in public spaces.

As per the Maintenance procedures, Saint Luke's Place shall:

- Apply best practices in the preventative maintenance of accessible elements with periodic checks such as;
 - Annual inspections, or more frequently
 - After storms or events that might affect accessible elements
 - As part of any reports of vandalism or complaints
- Apply best practices in the emergency maintenance of accessible elements with active response when notified

I) Notice of Temporary Service Disruption

When disruptions occur that will impact accessibility of goods, services or facilities provided by Saint Luke's Place, notice will be given to the public indicating:

- a) Description of the service disruption
- b) Reason for disruption
- c) Anticipated duration of disruption
- d) Alternate routes, facilities services, if any that are available
- e) Contact information

Notice will be given by posting the information at public entry points, key locations around the service disruption, posted on Saint Luke's Place website or

by such other methods reasonable.

7. Progress to Date and Ongoing Initiatives

See Scheduled “A” Progress and Ongoing Initiatives

8. Proposed Accessibility Initiatives 2021-2026

See Scheduled “B” Proposed Accessibility Initiatives for 2021-2026

9. Consultation of the Plan

In the preparation of this plan, Saint Luke’s Place conducted the following consultation activities:

- Consultation with Saint Luke’s Place Accessibility Planning Committee
- Consultation with the Residents of Saint Luke’s Place, surveys, and general meetings to receive comments
- Consultation with Saint Luke’s Place staff, surveys, and general meetings to receive comments

10. Communication of the Accessibility Plan

The approved Multi-Year Accessibility Plan shall be posted on Saint Luke’s Place website and be provided in an accessible format upon request.

11. Contact Information

The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is to improve opportunities for people with disabilities and to provide for their involvement in the identification, removal, and prevention of barriers to facilitate their full participation. Saint Luke’s Place strives to achieve this goal.

Please let us know how we can service you better. We welcome your feedback whether in person, by telephone, in writing, by email, or otherwise.

Contact information:

Phone: 519.658.5183
Fax: 519.658.2991
Mail: Saint Luke’s Place
1624 Franklin Blvd
Cambridge, ON N3C 3P4
Email: info@stlp.ca
Website: www.saintlukesplace.ca

If you require assistance while on site, please speak to the front business office or your direct service provider.

Documents and/or Policies relating to Accessibility at Saint Luke's Place are available upon request.

References:

<https://www.aoda.ca>

- Policy A-E-01 Removing Barriers
- Policy A-E-02 AODA Customer Service Standard
- Policy A-E-02a AODA Customer Service Standard- LEGISLATION
- Policy A-E-03 Service Animals
- Policy A-E-04 Support Persons
- Policy A-E-05 Identification of Potential Barriers During an Emergency Response
- Policy A-E-06 Notice of Disruption of Services
- Policy A-E-07 Parking
- Scheduled "A" Progress and Ongoing Initiatives
- Scheduled "B" Proposed Accessibility Initiatives for 2021-2026



SCHEDULE A Progress and Ongoing Initiatives

Accessibility Initiatives	Action to be Taken	Responsibility
Customer Service		
Potential barriers in delivering goods and services to customers	Provide training on Accessible Customer Service to all employees and volunteers Ongoing	Staff Educator/ Managers
	Review and update policies regularly to ensure high quality accessible customer service Ongoing	Administrator
	Reviewing customer feedback and taking appropriate action Ongoing	Administrator/ Managers
	An Updated Accessibility Policy was adopted in 2016	Administrator
General		
Accessibility Compliance Report	File additional Accessibility compliance reports as directed by the Ministry of Economic Development Trade and Employment Ongoing, as required	Administration
Training	Provide training on the requirements of the Integrated Accessibility Standards and on the Human Rights Code as it relates to people with disabilities Ongoing	Staff Educator/ Managers
Multi Year Plan	Develop and multi-year accessibility plan Multi-year plans developed for 2016-2019 2019-2021, 2021-2026	Accessibility Committee
Design of Public Spaces		
Ramp installed in C wing	C Wing Apartment garden path exit a	Maintenance/

garden path exit to allow direct access for tenants/visitors	ramp was constructed for ease of access Completed June 2019	Administration
Automatic Door Openers	C Wing Apartment entrance- install push button entrance to the side parking lot door Completed May 2019	Maintenance/ Administration
	E Wing entrance walkway requires resurfacing to ensure smooth transition when walking or using wheelchair or other mobility devices Completed April 2019	Maintenance/ Administration
Parking Lots- Accessible Parking	Must comply with the IASR when building new or making major changes to existing exterior paths of travel Ongoing	Maintenance/ Administration
General concern that although many aspects of our facility demonstrate and enable good accessibility, there are areas for accessibility improvements	Through our redevelopment project, we will ensure that our redevelopment facility meets accessibility requirements to comply with the IASR Ongoing- Redevelopment scheduled for 2025	Administration
Obtaining Services (Service counters, queuing guides and waiting areas)	Must comply with IASR when building new or making major changes to existing features Ongoing	Maintenance/ Administration
Information and Communications		
Accessible Formation and Communication Supports	Provide information and communicate in an accessible manner about goods, services, or facilities to people with disabilities, upon request Ongoing	Business Office/ Managers
Request need for clear signage for entrances from the city road. EMS often going to wrong entrance	Large, bright signage was installed at each entrance point of the campus indicating building entrance and parking availability Completed December 2019	Administration

Feedback	Ensure that receiving and responding to feedback is made available in an accessible format upon request or with appropriate communication supports As requested	All departments
Accessible Website	Ensure that the organizations website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 Level A Ongoing	Administration
Notice of Temporary Disruptions in Service	Ensure that notice of temporary disruptions in the services or facilities that people with disabilities use to access the organization's goods or services is posted Ongoing	All departments
Employment		
Potential barriers in existing policies, procedures, and practices	Regularly review policies, procedures and practices to ensure accessibility Ongoing	Human Resources
Potential barriers throughout the employment process Recruitment- general	Notify internal and external job applicants about availability of accommodations for applicants with disabilities in its recruitment processes Ongoing	Human Resources
Recruitment, Assessment or Selection Process	Notify job applicants who have been invited to participate in the recruitment, assessment, or selection process that accommodations for disabilities are available upon request Ongoing	Human Resources
Notice to Successful Applicants	Notify successful applicants of the policy for accommodating employees with disabilities when offering employment. Advised at orientation, in their letters of hire and communication with employees that require accommodation.	Human Resources

	Ongoing	
Informing Employees of Support	<p>Inform employees of policies supporting employees with disabilities. Provide updated information whenever there is a change to existing policies on the provision of job accommodations.</p> <p>Advised at orientation, in their letters of hire and through the Human Resources department.</p> <p>Ongoing</p>	Human Resources
Accessible Formats and Communication Supports for employees	<p>Consult an employee with a disability to provide or arrange for the provision of accessible formats and communication supports.</p> <p>As needed</p>	Human Resources
Documented Individual Accommodation Plans	<p>Develop a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>Process is place, however guideline under development to manage it</p> <p>Ongoing</p>	Human Resources
Return to work Process	<p>Develop and have in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work.</p> <p>Currently have a return-to-work process but guideline is under development</p> <p>Ongoing</p>	Human Resources
Redeployment	<p>Consider the accessibility needs of employees with disabilities as well as individual accommodation plans when redeploying employees with disabilities.</p> <p>Done through return-to-work process or individual accommodation plan</p> <p>Ongoing</p>	Human Resources



Schedule B
Proposed Accessibility Initiatives for 2021-2026

Accessibility Initiatives	Action to be Taken	Responsibility
General		
Customer Service Remove any potential barriers relating to Human Rights, health, and wellness for all customers	Consider diversity, equality when recruiting, admitting. Provide education and training on cultural diversity, equality at orientation and as required Wellness committee to promote positive culture through peer-to-peer training and counselling	All departments Wellness Committee
Electronic Payment	Request for electronic/ automatic payment of accounts through EFT Investigate options and costs/benefits for offering pre-authorized payments for rent/accommodations payments. Could help cut down on bad debts. Will not be voluntary	Finance Department
Design of Public Spaces		
Railing or barrier along garden path edges to prevent falling, wheels on mobility devices being lodged between pavement and grass	Must comply with the IASR when building new or making major changes to existing exterior paths of travel	Maintenance/ Administration
Automatic Door Openers	Automatic Doors buttons for apartment common areas such as lounges, laundry rooms, refuse rooms. Completed	Maintenance/ Administration
Emergency Lighting- A Wing	Additional emergency lighting required in the A Wings Must comply with the IASR when building new or making major changes to existing features	Maintenance/ Administration
Transportation	The Maintenance and Recreation department will be developing a	Leadership Team

	transportation plan to determine discontinuing current Saint Luke's Place owned van service and opting for external transportation agencies	
Smoke Free Environment	Provide support and assistance aides to promote a smoke free facility for all customers	All departments
Information and Communications		
Accessible Website	Ensure that the organizations website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 Level A Administrator contacted web designer for re-development of web site to ensure compliance with AODA standards Revamp of Website and content for 2022	Administration/ External IT Support
Point of Care Kiosks	Have regard to accessibility features that could be built into kiosks to best meet the needs of people with disabilities. Kiosks to be installed throughout each nursing unit Installation by December 2022 Completed	Administration
Digital Communication Boards	Have regard to accessibility features that could be built into digital communication boards (smart TV's) to best meet the needs of people with disabilities. Communication devices to be installed at major entrances and lounge areas Installation by June 2023 at administration entrance Completed	Maintenance/ Administration
Employment		
Performance Management	Consider the accessibility needs of employees with disabilities during performance management process. Update policy to reflect	Human Resources
Career Development and Advancement	Provide career development and advancement opportunities that take in	Human Resources

	account accessibility needs of employees with disabilities. Update policy to reflect	
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