

London X-Ray Associates

AODA – Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR)

Intent

This 2012 to 2023 accessibility plan outlines the policies and actions that London X-Ray Associates will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the [Integrated Accessibility Standards, Ontario Regulation 191/11](#).

Statement of Commitment

London X-Ray Associates believes in equal opportunity and is committed to providing a barrier-free environment that allows all people to maintain their independence and dignity. We respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)* and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

The continuous development of a multi-year accessibility plan will be reviewed and revised as required every three (3) years to ensure compliance with the regulations. Accessibility reports will be filed with the Ontario Government by the following dates:

December 31, 2014 – Submitted

December 31, 2017 – Submitted

June 30, 2021 – Submitted

December 31, 2023 - Submitted

Plan

General Requirements	
Accessibility Requirement:	Establishment of accessibility policies
Compliance Deadline:	January 1, 2012
Current Barriers:	Timely implementation to ensure all employees are trained and retrained on accessibility policies going forward. There is potential for a communication barrier and biases.
Plan to Meet Requirements:	Will develop accessibility policies, procedures and practices as outlined by the Ontario Government, IASR.
Potential Future Barriers:	Implemented. No future barriers foreseen.

Responsible Authority:	Chief Operating Officer
Results:	Acknowledged and completed
Accessibility Requirement:	Designing/procuring or acquiring self-serve kiosks
Compliance Deadline:	January 1, 2014
Current Barriers:	No Barriers at present.
Plan to Meet Requirements:	Will assess accessibility when purchasing or designing self-service kiosks. No self-serve kiosks are presently in service. Accessibility will be a requirement if procurement of a kiosk is considered. Process will need to develop for staff to support patients with disabilities in use of the kiosk or provide another accessible option. If purchasing or designing self-serve kiosks preventative and emergency procedures will be developed to ensure kiosk is in good working order. Patients will be notified of if temporary disruptions occur and will be greeted by an employee to be served at the service counter.
Potential Future Barriers:	Unknown at this time. Will need to access barriers prior to a procurement process.
Responsible Authority:	Chief Operating Officer
Results:	Completed and acknowledged
Accessibility Requirement:	Training on IASR and the <i>Human Rights Code</i>
Compliance Deadline:	January 1, 2015
Current Barriers:	Possible barrier of time to train all staff by deadline. As well as trainer and staff biases.
Plan to Meet Requirements:	Develop and provide appropriate training on the requirements of the IASR and Human Rights Code as it pertains to persons with disabilities, to employees, students, third-party contractors on LXA's behalf. Will provide training for all current employees and for all newly hired employees. Training records will be kept and maintained.
Potential Future Barriers:	Going forward, ensuring training is kept up to date with changing government legislation and internal policies. Will need to review annually Accessibility in Ontario website https://www.ontario.ca/page/accessibility-in-ontario for new information.
Responsible Authority:	Clinic Operations and People Services Administrator
Results:	Completed and acknowledged

Accessibility Requirement:	Feedback process, accessible formats, and communication support
Compliance Deadline:	January 1, 2015, and January 1, 2016
Current Barriers:	Potential barrier of cost if accessible options are limited. Time to ensure accessible formats are sent to patients/clients in a timely way as information is rapidly changing and accessible formats will require continual updates.
Plan to Meet Requirements:	Will ensure feedback processes are accessible to persons with disabilities. This will be visible on LXA's website and upon request. LXA will communicate accessible formats and communication supports upon request. LXA will provide or arrange for the provision of accessible formats for persons with disabilities as outlined under IASR. This will be completed in a timely manner as outline in our policy. Everyone making a request will be consulted to determine suitability of accessible formats based on need of person's disability.
Potential Future Barriers:	No future barriers are foreseen. However, as new technologies become available to support the information and communication standard the organization needs to become aware of these options. Annually will review Accessibility in Ontario website https://www.ontario.ca/page/accessibility-in-ontario for new technologies to support communication and accessible formats.
Responsible Authority:	Clinic Operations and People Services Administrator
Results:	Completed and acknowledged
Accessibility Requirement:	Emergency procedures, plans or public safety information
Compliance Deadline:	January 1, 2012
Current Barriers:	No barriers.
Plan to Meet Requirements:	Will provide publicly available emergency information when asked in an accessible format.
Potential Future Barriers:	No barriers foreseen.
Responsible Authority:	Clinic Operations and People Services Administrator
Results:	Completed and acknowledged
Accessibility Requirement:	Accessible websites and web content
Compliance Deadline:	WCAG2.0 Level A – January 1, 2014 WCG 2.0 Level AA - January 1, 2021
Current Barriers:	Cost and time frame
Plan to Meet Requirements:	LXA will ensure its website is in accordance with IASR as it pertains to World Wide Web Consortium Content Accessibility Guidelines (WCAG) 2.0, Level A (new websites and online content) by January 1, 2014, to Level AA for all content by January 1, 2021.

Potential Future Barriers:	No barriers foreseen. Director will continue to monitor new requirements as determined by WCAG.
Responsible Authority:	Director of Information Systems & Technology
Results:	Completed and acknowledged

Employment Standard	
Accessibility Requirement:	Recruitment, assessment, and selection processes
Compliance Deadline:	January 1, 2016
Current Barriers:	Ensuring all supervisors consistently inquire for all candidates if accommodations are required on disabilities.
Plan to Meet Requirements:	Policies and procedures were developed, and supervisors have been trained. In all job postings, on website in careers section, job descriptions and employment offer letters indicate requests for accommodations can be sought and are supported. As well, during the scheduling of interviews the inclusion of accommodation supports are presented. If an accommodation is requested LXA will support an accommodation that creates accessibility due to disability.
Potential Future Barriers:	To ensure ongoing consistency in approach to all potential future candidates.
Responsible Authority:	All Management and Clinic Operations and People Services Administrator
Results:	Completed and acknowledged.
Accessibility Requirement:	Informing employees of supports & accessible formats and communication support for employees
Compliance Deadline:	January 1, 2016
Current Barriers:	Biases and stigmas of asking for supports
Plan to Meet Requirements:	LXA will inform employees of accessibility supports (i.e., job accommodations) through education and training. All current employees will receive training and all new employees will receive training during orientation to LXA. It will be ongoing to continue to create an inclusive environment. Existing policies and practices will be updated and management will continue to provide employees with education as policies and practices change. Where an employee with a disability requests it; consultation with the employee to provide and support for information/accommodation that is needed to perform the job will be implemented. As well, a determination of accessible formats and/or communication support will be reviewed as part of this process.
Potential Future Barriers:	Endeavor to create an inclusive work environment where employees can overcome perceived stigma or biases about disabilities.

Responsible Authority:	All Management and Clinic Operations and People Services Administrator
Results:	Completed and acknowledged
Accessibility Requirement:	Workplace emergency response information
Compliance Deadline:	January 1, 2016
Current Barriers:	Potential for unconscious bias or perceived stigmas
Plan to Meet Requirements:	LXA will provide, where requested by an employee with a disability accessible formats and/or communication supports that best supports the individual. With the employee's consent, ensure that information is shared with designated emergency staff personal within the workspace. This may change if an employee works at multiple locations within the organization. A review of the employee's overall accommodation needs will be reviewed as needed and based on the disability.
Potential Future Barriers:	Ensuring current information is provided. Review individual plans annual or sooner if requested by employee.
Responsible Authority:	Chief Operating Officer
Results:	Completed and acknowledged
Accessibility Requirement:	Documented individual accommodation plans and return to work process
Compliance Deadline:	January 1, 2016
Current Barriers:	No barriers.
Plan to Meet Requirements:	Existing policies were reviewed to ensure LXA accommodates an employee with a disability and achieve a timely return to work after a leave due to disability. Employee accommodation plans and return to work plans are collaborative, written and individualized. LXA may require an evaluation of a physician or clinician expert to support the determination if an accommodation can be achieved and if it can be, how best to achieve an accommodation. Employee privacy will be maintained and consent will be sought if information needs to be shared to support the accommodation. Accessible formats, communication supports, and workplace emergency information may be included in this planning upon request. In the case where an accommodation plan or return to work plan is denied the employee will receive reasons why. LXA will work with the employee up to the point of undue hardship.
Potential Future Barriers:	Because each plan is individualized it is difficult to determine which barriers LXA and employees will face. Barriers will need to be reassessed over time.
Responsible Authority:	Chief Operating Officer
Results:	Completed and acknowledged
Accessibility Requirement:	Performance management, career development, advancement, and redeployment
Compliance Deadline:	January 1, 2016

Current Barriers:	Unconscious bias
Plan to Meet Requirements:	LXA will consider the needs of individuals with disabilities during performance management, career development, advancement, and where redeployment is required. An individual's accommodation plan will be reviewed to support these processes. Policies and procedures have been updated.
Potential Future Barriers:	No foreseen barriers.
Responsible Authority:	Chief Operating Officer
Results:	Completed and acknowledged.

Customer Service Standards	
Accessibility Requirement:	<p>Develop, implement, and maintain policies regarding the provisions of goods, services, or facilities to persons with disabilities.</p> <p>Prepare one or more documents describing the accessible customer service policies, provide on request, and notify that the documents are available on request.</p> <p>Prepare a document on the training policy, provide a copy of the document on request, notify that the document is available on request.</p> <p>Provide accessible customer service training to all staff. Provide training on changes to policies to staff on an ongoing basis and keep records of training.</p> <p>Establish a feedback process for providing goods, services, or facilities to persons with disabilities.</p> <p>Prepare a document on the feedback process, provide a copy of the document on request, notify that the document is available on request.</p>
Compliance Deadline:	January 1, 2012, and January 1, 2016
Current Barriers:	Time constraints and system barriers
Plan to Meet Requirements:	Developed policies, procedures, and practices to address customer service accessibility standards and LXA's organizational barriers when providing services to persons with disabilities. These policies have been posted to LXA's website for public access. Included in these policies are accessibility and provision of services, use of service animals and support persons, notice of temporary service disruptions, feedback process for client/patient, accessible communication with client/patient training for employees and use of assistive devices. All employees were trained and new employees are

	trained during orientation to LXA. LXA welcomes multiple methods of feedback about accessibility of services from persons with disabilities and respond in a timely manner. Continue to improve the quality-of-service delivery.
Potential Future Barriers:	None foreseen.
Responsible Authority:	Chief Operating Officer
Results:	Completed and acknowledged
Accessibility Requirement:	<p>Ensure that persons with disabilities are permitted to enter the premises with their service animal and to keep the animal with them unless the animal is otherwise excluded by law from the premises.</p> <p>Ensure that other measures are available to enable a person with a disability to obtain, use, or benefit from London X-Ray Associates' goods, services, or facilities if the person's service animal is excluded from the premises.</p> <p>Ensure that a person with a disability and their support person are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.</p> <p>Require a person with a disability to be accompanied by their support person only for a valid health and safety reason and after consulting with the person with a disability.</p> <p>Ensure that documents or information given to a person with a disability are offered in an accessible format or with communication support.</p>
Compliance Deadline:	January 1, 2012, revision August 1, 2016
Current Barriers:	Potential for attitudinal barrier.
Plan to Meet Requirements:	As mentioned above policies, procedures, practices, and employee training has been put in place to address these accessibility requirements. Management will continue to reinforce the accessibility and provision of services principles as employees have questions where a request is made and there is uncertainty. Ongoing just in-time training to continue to occur with employees with a goal to retrain on the customer service standards every three (3) years to ensure compliance with IASR.
Potential Future Barriers:	None foreseen.
Responsible Authority:	All Management and Clinic Operations and People Services Administrator
Results:	Completed and acknowledged

Accessibility Requirement:	Provide notice of any temporary disruption to services that may affect persons with disabilities. Prepare a document on temporary disruption of services, provide document on request, notify that the document is available on request.
Compliance Deadline:	January 1, 2012, revision August 1, 2016
Current Barriers:	No barriers.
Plan to Meet Requirements:	LXA developed policy and procedure for notice of service disruption. Posted to website. When there is a temporary service disruption booked patients will be notified by phone, a notice will be posted to LXA's website and a written notice will be posted at the entrance to the clinic.
Potential Future Barriers:	No barriers foreseen.
Responsible Authority:	Clinic Operations and People Services Administrator
Results:	Completed and acknowledged

Public Spaces	
Accessibility Requirement:	Building new public spaces and making planned significant alterations to existing public spaces
Compliance Deadline:	January 1, 2015
Current Barriers:	No current barriers as this would be either new or planned significant alterations.
Plan to Meet Requirements:	<p>When purchasing or designing new service patients' areas such as reception counters, LXA will make the counter accessible for persons with mobility aides (e.g., walkers and wheelchairs). Currently no seating areas have fixed seating to the floor. All new waiting rooms will continue with movable seating to ensure flexibility. Will contract a 3rd party contractor to support LXA in meeting future design requirements with either existing or new public spaces.</p> <p>Both preventative and emergency procedures will be developed to ensure public spaces are in good working order. This is completed through organized physical inspections, during health and safety audits and through maintenance requests or patient complaints. Patients will be notified of if temporary disruptions occur by phone or will be greeted by an employee to be served at the service counter, reschedule their appointment, or accommodate the patient at one of our other locations.</p>
Potential Future Barriers:	There will be a requirement in many instances for additional space to be leased to accommodate increased space requirements. This will need to be accounted for within the

	budgeting process for either significant alternation or acquisition of new public space.
Responsible Authority:	Chief Operating Officer
Results:	Completed and acknowledged

Review and Update

This document will be reviewed every three (3) years by the Chief Operating Officer using the accessibility compliance reporting tool. This document was last reviewed on December 6, 2023.