BRANT COMMUNITY HEALTHCARE SYSTEM INTEGRATED ACCESSIBILITY STANDARD MULTI YEAR PLAN

Submitted to

David McNeil

Chief Executive Officer

Prepared by

Cindy Hayward-Dale, Manager Organizational Health,
Organizational Development, Volunteer Engagement
Erin Sleeth, Chief Human Resources Officer
Accessibility Committee

This publication is available on the hospitals website

www.bchsys.org

and in alternate formats upon request

Executive Summary

The purpose of the *Accessibility for Ontarians with Disability Act 2005 (AODA)* is to make Ontario barrier free and accessible to people with disabilities by 2025. Under this legislation, the Government of Ontario has developed mandatory accessibility standards that will identify remove and prevent barriers for people with disabilities in key areas of daily living. The standards will apply to private and public sector organizations across Ontario.

The AODA builds on progress made under earlier legislation. The *Ontarians with Disabilities Act, 2001 (ODA)* required the Ontario Government and the broader public sector, which included municipalities, public transportation organizations, colleges and universities, hospitals and school boards, to develop annual accessibility plans. These obligations under the ODA remain in effect as accessibility standards are developed under the AODA. To prepare and revise our annual accessibility plan, we have consulted with persons with disabilities and their representatives and we have made the plan public.

Brant Community Healthcare System's Multi-Year Accessibility Plan continues to address and update changes made to comply with *AODA integrated Accessibility Standards Regulation (version July 1, 2016)* and describes:

- 1. The measures the hospital has taken in the past, and
- 2. The measures that the hospital would take during the year to identify, remove and prevent barriers to people with disabilities who live, work in or use the facilities and services of the hospital, including patients and their family members, staff, healthcare practitioners, volunteers and members of the community.

Brant Community Healthcare System is committed to the continual improvement of access to hospital facilities, policies, programs, practices and services for patients and their family members, staff, healthcare practitioners, volunteers and members of the community with disabilities: the participation of persons with disabilities in the development and review of its annual accessibility plans; and the provision of quality services to all patients and their family members and member of the community with disabilities.

It is the intent of Brant Community Healthcare System to provide fully accessible services to staff, physicians, volunteers and the community in accordance with the *Accessibility for Ontarians with Disabilities Act 2005 (AODA)*. We strive to provide services in a way that respects the dignity and independence of people with disabilities. We are committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in a timely manner, in the same place and in a similar way as other individuals.

In an effort to improve access to those persons having a disability, as defined in the *Ontarians with Disabilities Act, 2001*, the hospitals Accessibility Advisory Committee continues to identify, prioritize and implement further opportunities for improvement, in consultation with persons with disabilities

Compliance Schedule for Public Sector Organizations

Workplace Emergency Response Information	2012
Accessibility Policies and Multi Year Plan	2013
Procuring and Acquiring Goods, Services or Facilities	2013
Self Service Kiosks	2013
Emergency Procedure Plans and Public Safety Information	2013
Training	2014
Feedback Process	2014
Accessible Website and Web Content Level A	2014
Recruitment, Assessment or Selection Process	2014
Performance Management and Career Development	2014
Accommodation Plans and Return to Work	2014
Accessible Formats and Communication Supports	2015
Design Public Spaces	2016
Accessible Web Sites and Web Content level AA	2021

Part I – Customer Serv	Part I – Customer Service Standards			
Regulation Section	Compliance Date	Requirements	Compliance Action	
Establishment of Policies & Procedures (AODA, 2005, O. Reg. 429/07, s. 3)	Jan. 1, 2010	Every provider of goods and services shall establish policies, practices, and procedures governing the provision of its goods or services to persons with disabilities (AODA, 2005,).	Policy: • Developed the Accessibility- Providing Customer Service to People with Disabilities (2010) policy.	
			Communication: Accessible through the: DOCS System External Web Page: Accessibility.	
		 2. The Provider shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following: a) goods and services are provided in a manner that respects the dignity and independence of persons with disabilities b) the provision of goods and services to persons with disabilities and others must be integrated unless an alternate measure is necessary, whether temporarily or permanently, to enable a person to obtain, use or benefit from the good or services c) Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services (AODA, 2005). 	Policy: • Integrated within the Accessibility-Providing Customer Service to People with Disabilities (2010) policy. Communication: Accessible through the: • DOCS System • External Web Page: Accessibility.	

Regulation Section	Compliance Date	Requirements	Compliance Action
		3. The policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the provider's goods or services or the availability, if any, or other measures which enable them to do so (AODA, 2005)	
		4. When communicating with a person with disability a provider shall do so in a manner that takes into account the person's disability (AODA, 2005).	Policy: • Integrated within the Accessibility- Providing Customer Service to People with Disabilities (2010) policy.
			Education/Training: Integrated within the Accessibility for Ontarians with Disabilities Act progran (e-learning)
		5. Shall prepare one or more documents describing its policies, practices and procedures and, upon request, shall give a copy of a document to any person (AODA, 2005).	Policy: • Developed the Accessibility- Providing Customer Service to People with Disabilities (2010) policy.
			Communication:
			Accessible through the: • DOCS System

			External Web Page :Accessibility
Use of Service Animals and Support Persons (AODA, 2005, O. Reg. 429/07, s. 4)	Jan 1, 2010	2. If a person with disability is accompanied by a guide dog or other service animal, the provider of goods and services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises (AODA, 2005).	Policy: Integrated within the Accessibility-Providing Customer Service to People with Disabilities (2010) policy.
		 3. If a service animal is excluded by law from the premises, the provider of goods or services shall ensure that other measures are available to enable to person with a disability to obtain use or benefit from the provider's good or services (AODA, 2005). 4. If a person with a disability is accompanied by a support person, the provider of goods or services shall ensure that 	.Education/Training: Integrated within the Accessibility for Ontarians with Disabilities Act program (e-learning)
		both persons 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 (AODA, 2005). 5. The provider of goods or services may require a person	
		with a disability to be accompanied by a support person when on the premises but only if a support person is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises (AODA, 2005).	
		6. If an amount is payable by a person for admission to the premises or in connection with a person's presence at the premises the provider of goods or services shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person (AODA, 2005).	This requirement does not apply to Brant Community Healthcare System as there are no payable admissions

		directly related to accessing the hospital.
	7. The provider shall prepare documents describing its policies, practices and procedures with respect to the matters governed by this section and, upon request, shall give a copy of a document to any person (AODA, 2005).	 Policy: Integrated within the Accessibility- Providing Customer Service to People with Disabilities (2010) policy
		 Education/Training: Integrated within the Accessibility for Ontarians with Disabilities Act program (e-learning)
Jan 1, 2010	1. If there is a temporary disruption in particular facilities or services utilized by person with disabilities in whole or part, the provider shall give notice of the disruption to the public (AODA, 2005).	Policy: • Integrated within the Accessibility- Providing Customer Service to People with Disabilities (2010) policy
	reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available (AODA, 2005).	Communication: . Accessible through the: • DOCS System • External Web Page: Accessibility. •
	3. Notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider of goods or services, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances (AODA, 2005).	Notice of temporary disruptions to be posted on external Website: Accessibility
	Jan 1, 2010	Jan 1, 2010 1. If there is a temporary disruption in particular facilities or services utilized by person with disabilities in whole or part, the provider shall give notice of the disruption to the public (AODA, 2005). 2. Notice of disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available (AODA, 2005). 3. Notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider of goods or services, by posting it on the provider's website, if any, or by such other method as is reasonable in the

		4. The provider shall prepare a document that set out the steps to be taken in connection with a temporary disruption and, upon request shall give a copy of the document to any person (AODA, 2005).	Policy: • Developed the Accessibility- Providing Customer Service to People with Disabilities (2010) policy. Communication: Accessible through the: • DOCS System • External Web Page: Accessibility.
Training for staff, etc. (AODA, 2005, O. Reg. 429/07, s. 6)	Jan 1, 2010	1. Every provider of goods or services shall ensure that the following persons receive training about the provision of its good or services to person with disabilities: - Every person who deals with members of the public or other third parties on behalf of the provider, whether the person does so as an employee agent, volunteer, or otherwise. - Every person who participates in developing the provider's policies practices and procedures governing the provision of goods or services to members of the public or other third parties (AODA, 2005).	Education/Training: • Integrated within the Accessibility for Ontarians with Disabilities Act program. The training program was delivered through the following: ○ Packaged training presentations for Managers; ○ Facilitator led training sessions; ○ On-line training course (Accessible through the Halogen Learning System).

 2. The training must include a review of the purposes of the Act and requirements of the Regulation and instruction about the following matters: How to interact and communicate with persons with various types of disability How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or 	Education/Training: Integrated within the Customer Service for People with Disabilities training program.
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------

Part I – Customer Service Standards			
Regulation Section	Compliance Date	Requirements	Compliance Action
		other service animal or the assistance of a support device - How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability - What to do is a person with a particular type of disability is having difficulty accessing the provider's goods or services (AODA, 2005)	
		3. The training must be provided to each person as soon as practicable after he or she is assigned the application duties (AODA, 2005).	Education/Training:

		4. This training must also be provided on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities (AODA, 2005).	 Implemented Customer Service for People with Disabilities training program. The training program was delivered through the following: Packaged training presentations for Managers; Facilitator led training sessions; On-line training course (Accessible through the Learning Management System).
		5. Shall prepare a document describing its training policy and the document must include a summary of the contents of the training and details of when the training is to be provided (AODA, 2005).	Policy: • Developed the Accessibility- Providing Customer Service to People with Disabilities (2010) policy
		6. Shall keep records of the training provided under this section including that dates on which the training is provided and the number of individuals to whom it is provided (AODA, 2005).	Communication: Accessible through the: DOCS System External Web Page: Accessibility. Documentation of training, specifically the dates and names of individuals receiving the training, shall be recorded through the Learning Management System.
Feedback Process for providers of goods or services (AODA, 2005, O. Reg. 429/07, s. 7)	Jan 1, 2010	1. Shall establish a process for receiving and responding to feedback about the manner in which it provides good or services to person with disabilities and shall make information about the process readily available to the public (AODA, 2005).	Policy: • Developed the Accessibility- Providing Customer Service to People with Disabilities (2010) policy.

		 The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise (AODA, 2005). The feedback process must specify the actions that the provider of goods or services is required to take if a complaint is received (AODA, 2005). Shall prepare a document describing its feedback process and, upon request, shall give a copy of the document to any person (AODA, 2005). 	Communication: Accessible through the: DOCS System External Web Page: Accessibility. Developed the Patient, Family & Visitor Complaints & Compliments Policy Accessible through the: DOCS system
Notice of Availability of documents (AODA, 2005, O. Reg. 429/07, s. 8)	Jan 1, 2010	 Shall notify persons to whom it provides good or services that the documents required by the Regulation are available upon request (AODA, 2005). The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances (AODA, 2005). 	Communication: • Posted on the External Web Page – Accessibility.
Format of documents (AODA, 2005, O. Reg. 429/07, s. 9)	Jan 1, 2010	 If a provider of goods or services is required by this Regulation to give a copy of a document to a person with a disability, the provider shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability (AODA, 2005). The provider of goods or services and the person with a disability may agree upon the format to be used for the document or information (AODA, 2005). 	Communication: • Information on the availability of the required documents in accessible formats posted on the external Web Page- Accessibility

Moving Forward - Continuing our Commitment to Accessibility

General Integrated Standards

Brant Community Healthcare System is committed to providing our clients with access to our documents in relation to the Integrated Standards of the *Accessibility for Ontarians with Disabilities Act (AODA, 2005)*. We will provide training to employees, volunteers, and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. The hospital will take the following steps to ensure compliance with all of the General Integrated Standards by each of their individual deadlines.

Part II – General Integrated Standards			
Regulation Section	Compliance Date	Requirements	Action
Establishment of Accessibility Policies (AODA, 2005, O. Reg. 191/11, s. 3)	Jan 1, 2013	Develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through the Integrated Standards (AODA, 2005).	Policy: Developed the Accessibility-Providing Customer Service to People with Disabilities (2010) policy Communication: Accessible through the: DOCS System External Web Page :Accessibility

2. Include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner (AODA, 2005).	Policy: Developed the Accessibility-Providing Customer Service to People with Disabilities (2010) policy Communication: Accessible through the: DOCS System External Web Page: Accessibility.
3.a. Prepare at least one written document describing its policies; and (AODA, 2005)	Policy: • Developed the Accessibility- Providing Customer Service to People with Disabilities (2010) policy
3. b. Make the documents publicly accessible and provide them in an accessible format upon request.	Communication: Accessible through the: DOCS System External Web Page :Accessibility

Part II – General Integrated Standards			
Regulation Section	Compliance Date	Requirements	Action
Accessibility Plans (AODA, 2005, O. Reg. 191/11, s. 4)	Jan 1, 2013	4. a. Establish, implement, maintain, and document a multi-year accessibility plan (AODA, 2005).	Policy: • Developed the Brant Community Healthcare System Accessibility Plan, 2010 with revisions 2015, 2019
		4. b. Post accessibility plan on website, if any, and provide the plan in an accessible format upon request (AODA, 2005).	 Communication: Brant Community Healthcare System Accessibility Plan, 2013-2021 Accessible through the: External Web Page :Accessibility
			Communication: • Information on the availability of the Brant Community Healthcare System Accessibility Plan, 2013-2021 in accessible formats posted on the External Web Page: Accessibility. & Affirmation Statement.

	4. c. Review and update the accessibility plans at least once every 5 years (AODA, 2005).	Policy: • Revised existing Accessibility- Providing Customer Service to People with Disabilities (2010) policy to include mandatory review of the Brant Community Healthcare Accessibility Plan, 2013-2021 every five years.
	5. Establish, review and update accessibility plans in consultation with persons with disabilities and if have established an accessibility advisory committee, must consult with the committee (AODA, 2005).	Policy: Developed the Brant Community Healthcare System's Hospital Accessibility Plan, 2013-2021 in consultation with persons with disabilities. Future review and updates to the Brant Community Healthcare System's Accessibility Plan, 2013- 2021 will be made in consultation with persons with disabilities.

		3.a. Prepare an annual status report on the progress of measure taken to implement the strategy referenced in the clause (1); and (AODA, 2005)	 Committee: The Accessibility Advisory Committee will provide an annual status update on the actions taken to comply with the regulations. These updates shall be made directly on the Brant Community Healthcare System's Accessibility Plan, 2013-2021.
		3. b. Post the status report on their website, if any, and provide the report in an accessible format upon request (AODA, 2005).	Communication: • Information on the annual status update will be made available on the Brant Community Healthcare System's Accessibility Plan, 2013-2021 which can be accessed through the external web page – Accessibility at Brant Community Healthcare System & Affirmation Statement.
Procuring or acquiring goods, services, or facilities (AODA, 2005, O. Reg. 191/11, s. 5)	Jan 1, 2013	Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so	Policy: • Integrated within the revised Procurement of Goods and Services Policy. Communication: • Accessible through the: • DOCS system Internal Documents: Developed and integrated accessibility assessment criteria into RFP and RFI documents, where practicable.

Part II – General Integrated Standards			
Regulation Section	Compliance Date	Requirements	Action
Self-service kiosks (AODA, 2005, O. Reg. 191/11, s. 6)	Jan 1, 2013	 Incorporate accessibility features when designing, procuring or acquiring self-service kiosks (AODA, 2005). Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks (AODA, 2005). 	Developed and integrated accessibility assessment criteria into RFP and RFI documents, where practicable.
Training (AODA, 2005, O. Reg. 191/11, s. 7)	Jan 1, 2014	1. Provide training on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to: all employees, volunteers, persons who participate in the development of the Organization's policies, persons who provide goods, services, facilities on behalf of the organization (AODA, 2005).	 Education/Training: Implemented the AODA Customer Service for People with Disabilities training program. The training program will be delivered through the following: On-line training course (Accessible through the Learning Management System).
		 Training shall be appropriate to the duties of the employees, volunteers and other persons (AODA, 2005). Every person shall be trained as soon as practicable (AODA, 2005). Training shall be provided in respect of any changes to the policies on an ongoing basis (AODA, 2005). 	Education/Training: AODA Customer Service for People with Disabilities training program.

	5. Every designated public sector organization and every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number to whom it is provided.	Education/Training: A training record shall be kept by the Organizational Development Department (Human Resources sub group)
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------

Information & Communications Standards

Brant Community Healthcare System 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. The hospital will take the following steps to ensure compliance with all of the Information & Communication Standards, as outlined by the *Accessibility for Ontarians with Disabilities Act* (AODA, 2005), by their individual deadlines.

Part III - Information & Communication Standards			
Regulation Section	Compliance Date	Requirements	Action
Feedback (AODA, 2005, O. Reg. 191/11, s. 11)	Jan 1, 2014	1. Processes for receiving and responding to feedback must be accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request (AODA, 2005).	The Risk & Quality Management Department pursued compliance by collaborating with the following stakeholders:
		3. Notify the public about the availability of accessible formats and communication supports.	 Patient Relations; and Communications/Public Affairs.
Accessible formats and communication supports (AODA, 2005, O. Reg. 191/11, s. 12)	Jan 1, 2015	1. Shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no more cost than the cost charged to other persons (AODA, 2005).	 Patient, Family & Visitor Complaints & Compliments Policy in place Communication:
		2. Shall consult with the person making the request in determining suitability of an accessible format or communication support (AODA, 2005).	pursued compliance by collaborating with the following stakeholders: • Patient Relations; and • Communications/Public Affairs. • Patient, Family & Visitor Complaints & Compliments Policy in place
		3. Shall notify the public about the availability of accessible formats and communication supports (AODA, 2005).	

Emergency procedure, plans or public safety information (AODA, 2005, O. Reg. 191/11, s. 13)	Jan 1, 2012	1. Any emergency procedures, plans or public safety information and made available to the public must also be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request (AODA, 2005).	The Risk & Quality Department have collaborated with the following stakeholders: • Communications/Public Affairs; • Information Access & Privacy Office to obtain and have available
Accessible websites and web content (AODA, 2005, O. Reg. 191/11, s. 14)	January 1, 2014 - all new material Level A January 1, 2021 - all	1. Shall make internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA (AODA, 2005).	 Website built to AODA standards & Regulations by contracted design firm Website is fully accessible to reading software and font increases or decreases
	content Level AA		

Employment Standards

Brant Community Healthcare System is committed to fair and accessible employment practices. The hospital will take the following steps to ensure compliance with all of the Employment Standards, as outlined by the *Accessibility for Ontarians with Disabilities Act (AODA, 2005)*, by each individual deadline.

Part IV – Employment	Standards		
Regulation Section	Compliance Date	Requirements	Action
Recruitment General (AODA, 2005, O. Reg. 191/11, s. 22)	Jan 1, 2014	Shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process (AODA, 2005).	Developed the Hiring Policy, and individual communication sent to eligible participants requesting information for accommodation
Recruitment, assessment or selection process (AODA, 2005, O. Reg.	Jan 1, 2014	1. During recruitment shall notify job applicants that are selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes being used (AODA, 2005).	needs. Communication:
191/11, s. 23)		2. If a selected participant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that take into account the applicant's accessibility needs.	Accessible through the: • DOCS System
Notice to successful applicants (AODA, 2005, O. Reg. 191/11, s. 24)	Jan 1, 2014	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities (AODA, 2005).	
	Jan 1, 2014	1. Shall inform employees of its policies used to support its employees with disabilities as soon as practicable after they begin their employment (AODA, 2005).	

Informing Employees of Supports (AODA, 2005, O. Reg. 191/11, s. 25)		2. Information of policies shall be provided to new employees as soon as practicable after they begin their employment (AODA, 2005). 3. Shall provide updated information to employees whenever there is a change to existing policies on the provisions of job accommodations that take into account an employee's accessibility needs due to disability (AODA, 2005).	
Accessible formats and communication supports for employees (AODA, 2005, O. Reg. 191/11, s. 26)	Jan 1, 2014	 Where an employee with disabilities requests it, the employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: information that is needed in order to perform the employee's job; and Information that is generally available to employees in the workplace (AODA, 2005). Shall consult with employee making request in determining the suitability of an accessible format or communication support (AODA, 2005). 	Developed the Pre-employment policy, as well as referral for Ergonomic assessments to identify aids/technology required Communication: Accessible through the: DOCS System
Workplace emergency response information (AODA, 2005, O. Reg.	Jan 1, 2012	1. Provide individualized workplace emergency response information to employees who have a disability, where necessary (AODA, 2005).	In consultation with the Accessibility Advisory Committee, Organizational Health will
191/11, s. 27)		2. If employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, the employer will designate a person to provide assistance to the employee and provide that person with the individualized response information (AODA, 2005).	 document and provide information based on individualized workplace Emergency response plans Identify most responsible person to assist
		3. The information will be provided as soon as practicable after the employer becomes aware of the need for accommodation due to the employee disability (AODA, 2005).	Forms of assistanceLocation

		4. Shall review the individualized workplace emergency response information, a) when the employee moves to a different location in the organization; b) when the employee's overall accommodations needs or plans are reviewed; and c) when the employer reviews its general emergency response policies (AODA, 2005).	
Documented individual accommodation plans (AODA, 2005, O. Reg.	Jan 1, 2014	1. Shall develop and have in place a written process for the development of documented individualized accommodation plans for employees with disabilities (AODA, 2005).	In consultation with the Accessibility Advisory Committee, Organizational Health will
		2. The process for development shall include the following	 document and provide information based on individualized workplace Emergency response plans Identify most responsible person to assist Forms of assistance Location

191/11, s. 28)		elements:	Policy
		a) the manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;	Developed the Modified Work, Early & Safe Return to Work Policy
		 b) the manner in which the employee is assessed on an individual basis; c) the manner in which the employee can request the participation of a representative from their bargaining agent, if applicable, or other representative from the workplace, in the development of the accommodation plan; d) the steps taken to protect the privacy of the employee's personal information; e) the frequency with which the individual accommodation plan will be reviewed and update and the manner in which it will be done; 	Communication: Accessible through the: DOCS System
		f) if an individual plan is denied, the manner in which the reasons for the denial will be provided to the employee; and g) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability (AODA, 2005).	
		3. Individual accommodation plans shall, a) if requested, include any information regarding accessible formats and communication supports provided; b) if required, include individualized; and workplace emergency response information c) Identify any other accommodation that is to be provided (AODA, 2005).	
Return to work process (AODA, 2005, O. Reg. 191/11, s. 29)	Jan 1, 2014	1.a. Shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and 1. b. Shall document the process (AODA, 2005).	Policy Developed the Modified Work, Early & Safe Return to Work Policy Communication:
		2. The return to work process shall,	Accessible through the: DOCS System

		a)outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and b) Use documented individual accommodation plans as part of the process (AODA, 2005).	
Performance Management (AODA, 2005, O. Reg. 191/11, s. 30)	Jan 1, 2014	Shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management in respect of employee with disabilities (AODA, 2005).	Policy Developed the Performance Management Program which can accommodate identified accessibility needs
Career development and advancement (AODA, 2005, O. Reg. 191/11, s. 31)	Jan 1, 2014	1. Shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when providing career development and advancement to its employees with disabilities (AODA, 2005).	Communication: Accessible through the: DOCS System
Redeployment (AODA, 2005, O. Reg. 191/11, s. 32)	Jan 1, 2014	1. Shall take into account the accessibility needs of its employees with disabilities as well as individual accommodation plans, when redeploying employees with disabilities (AODA, 2005).	

Transportation Standard

Brant Community Healthcare System is committed to meeting the transportation needs of people with disabilities. Although Brant Community Healthcare does not provide any transportation services to those with disabilities, the hospital has taken the following steps to ensure compliance with the Transportation Standard outlined by the *Accessibility for Ontarians with Disabilities Act (AODA, 2005)*.

Part V – Transportation Standard			
Regulation Section	Compliance Date	Requirements	Action

Public sector organizations (AODA, 2005, O. Reg. 191/11, s. 76)	July 1, 2011	76. Designated public sector organizations (including hospitals) that are not primarily in the business of transportation, but that provide transportation services, shall provide accessible vehicles or equivalent services upon request (AODA, 2005).	Brant Community Healthcare System does not provide any transportation services to people with disabilities. However, Brant Community Health Care System does provide assistance to acquire an equivalent mode of transportation:
			 Brant Community Healthcare System provides telephones, at two hospital entrances, with a direct line to a contracted taxi company. The service is self-pay, but does provide access to cars and vans provided by the taxi company
			 Brant Community Healthcare System provides non-emergent transfer services for those requiring a stretcher transfer. Eligibility for this service is determined on a case-by-case basis by the most responsible clinical team.

Built Environment Standard

Brant Community Healthcare System is committed to creating an environment that takes into consideration the specific needs of persons with disabilities. The hospital will take the following steps to ensure compliance with all of the Built Environment Standards, as outlined by the *Accessibility for Ontarians with Disabilities Act (AODA, 2005)*, by their individual deadlines.

Part VI – Built Environment Standard			
Regulation Section	Compliance Date	Requirements	Action
Outdoor public use eating areas, application (AODA, 2005, O. Reg. 191/11, s. 80.16, O. Reg. 413/12 s. 6)	January 1, 2016	 (1) The requirements in section 80.17 apply to newly constructed and redeveloped outdoor public use eating areas that an obligated organization intends to maintain and that fall within the description set out in subsection (2). (2) The outdoor public use eating areas to which subsection (1) 	No outdoor public use eating areas established at Brant Community Healthcare System, due to inability to meet AODA needs
6)		applies consist of tables that are found in public areas, such as in public parks, on hospital grounds, and on university campuses and are specifically intended for use by the public as a place to consume food.	If space is identified in future: In collaboration with Redevelopment, Maintenance and
Outdoor public use eating areas, general requirements (AODA, 2005, O. Reg. 191/11, s. 80.17, O. Reg. 413/12 s. 6)	January 1, 2016	Obligated organization shall ensure that where they construct or redevelop outdoor public use eating areas that they intend to maintain, the outdoor public use eating areas must meet the following criteria:	Facilities and third party contractors compliance will be maintained by AODA standards in renovations or new structure construction
	acc cle tha	1. A minimum of 20% of the tables that are provided must be accessible to persons using mobility aids by having knee and toe clearance underneath the table and in no case shall there be fewer than one table in an outdoor public use eating area that meets this requirement.	
		2. The ground surface leading to and under tables that are accessible to persons using mobility aids must be level, firm and stable.	
		3. Tables that are accessible to persons using mobility aids must have clear ground space around them that allows for a forward approach to the tables.	
Exterior paths of travel, application (AODA, 2005, O. Reg. 191/11, s. 80.21, O. Reg. 413/12 s.	January 1, 2016	(1) this Part applies to newly constructed and redeveloped exterior paths of travel 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	

Part VI – Built Environn	nent Standard		
Regulation Section	Compliance Date	Requirements	Action
6)		Recreational experience.	
Exterior paths of travel, general (AODA, 2005, O. Reg. 191/11, s. 80.22, O. Reg. 413/12 s. 6)	January 1, 2016	Obligated organizations shall ensure that any exterior paths of travel that they construct or redevelop and intend to maintain meet the requirements set out in the part.	
Exterior paths of travel, technical (AODA, 2005, O. Reg. 191/11, s. 80.23, O. Reg. 413/12 s. 6)	January 1, 2016	When constructing new or redeveloping existing exterior paths of travel that they intend to maintain, obligated organizations shall ensure that new and redeveloped exterior paths meet the following requirements:	In collaboration with Redevelopment, Maintenance and Facilities and third party contractors compliance will be maintained by
		1. The exterior path must have a minimum clear width of 1,500mm, but this clear width can be reduced to 1,200mm to serve as a turning space where the exterior path connects with a curb ramp.	AODA standards when any renovations or new structure construction commences
		2. Where the head room clearance is less than 2,100 mm over a portion of the exterior path, a rail or other barrier with a leading edge that is cane detectable must be provided around the object that is obstructing the head room clearance.	
		3. The surface must be firm and stable.	
		4. The surface must be slip resistant.	
		 5. where an exterior path has openings in its surface, i. the openings must not allow passage of an object that has a diameter of more than 20 mm and, ii. Any elongated openings must be oriented approximately 	
		perpendicular to the direction of travel. 6. The maximum running slope of the exterior path must be no more than 1:20, but where the exterior path is a sidewalk, it can have a slope greater than 1:20, but it cannot be steeper than the slope of the adjacent roadway. 7. The maximum cross slope of the exterior path must be no more than 1:20, where the surface is asphalt, concrete or some	

Exterior paths of travel, ramps (AODA, 2005, O. Reg. 191/11, s. 80.24, O. Reg. 413/12 s. 6)	January 1, 2016	 8. the exterior path must meet the following requirements: i. it must have a 1:2 bevel at changes in level between 6 mm and 13 mm ii. it must have a maximum running slope of 1:8 or a curb ramp that meets the requirement of section 80.26 at changes in level of 75 mm or greater and 200 mm or less. iii. It must have maximum running slope of 1:10 or a curb ramp that meets the requirement of section 80.26 at changes in level of 75 mm or greater and 200 mm or less. iv. It must have a ramp that meets the requirements of section 80.24 at changes in level of greater than 200 mm. 9. The entrance to the exterior path of travel must provide a minimum clear opening of 850 mm, whether the entrance includes a gate, bollard or other entrance design. Where an exterior path of travel is equipped with a ramp, the ramp must meet the following requirements: 1. The ramp must have a minimum clear width of 900 mm. 2. The surface of the ramp must be firm and stable. 3. The surface of the ramp must be slip resistant. 4. The surface of the ramp must have a maximum running slope of no more than 1:15. 5. the ramp must be provided with landings that meet the following requirements: i. landings must be provided, A. at the top and bottom of the ramp, Bwhere there is an abrupt change in direction of the ramp, and 	In collaboration with Redevelopment, Maintenance and Facilities and third party contractors compliance will be maintained by AODA standards when any renovations or new structure construction commences
		following requirements: i. landings must be provided, A. at the top and bottom of the ramp, Bwhere there is an abrupt change in direction of	

Regulation Section	Compliance Date	Requirements	Action
		6. Where a ramp has openings in its surface, i. The openings must not allow passage of an object that has a diameter of more than 20 mm, and ii. Any elongated openings must be oriented approximately	
		perpendicular to the direction of travel. 7. A ramp must be equipped with handrails on both sides of the ramp and the handrails must, i. Be continuously graspable along their entire length and	
		have circular cross-section with an outside diameter not less than 30 mm and not more than 40 mm, or any noncircular shape with a graspable portion that has a perimeter not less than 100 mm and not more than 155 mm and whore largest cross-section dimension is not more than 57 mm,	
		ii. Be not less than 865 mm and not more than 965 mm high, measured vertically from the surface of the ramp, except that handrails not meeting these requirements are permitted provided they are installed in addition to the required handrail,	
		iii. Terminate in a manner that will not obstruct pedestrian travel or create a hazard,	
		 iv. Extend horizontally not less than 300 mm beyond the top and bottom of the ramp, 	
		v. Be provided with a clearance of not less than 50 mm between the handrail and any wall to which it is attached, and	
		 vi. Be designed and constructed such that handrails and their supports will withstand the loading values obtained from the non-concurrent application of a concentrated load not less than 0.9 kN applied at any point and in any direction vii. For all handrails and a uniform load not less than 0.7 kN/metre applied in any direction to the handrail. 	

Part VI – Built Environ	Part VI – Built Environment Standard				
Regulation Section	Compliance Date	Requirements	Action		
		8. where the ramp is more than 2,200 mm in width, i. one or more intermediate handrails which are continuous between landings shall be provided and located so that there is no more than 1,650 mm between handrails, and ii. The handrails must meet the requirements set out in paragraph 7.	In collaboration with Redevelopment, Maintenance and Facilities and third party contractors compliance will be maintained by AODA standards		
		 9. the ramp must have a wall or guard on both sides and where a guard in provided, it must, i. Be not less than 1,070 mm measured vertically to the top of the guard from the ramp surface, and ii. Be designed so that no member, attachment or opening located between 140 mm and 900 mm above the ramp surface being protected by the guard will facilitate climbing. 			
		 10. The ramp must have edge protection that is provided, i. With a curb at least 50 mm high on any side of the ramp where no solid enclosure or solid guard is provided, or ii. With railing or barriers that extend to within 50 mm of the finished ramp surface. 	when any renovations or new structure construction commences		
Exterior paths of travel, stairs (AODA, 2005, O. Reg. 191/11, s. 80.25, O. Reg. 413/12 s. 6)	January 1, 2016	 Where the stairs connect to exterior paths of travel, the stairs must meet the following requirements: 1. The surface of the treads must have a finish that is slip resistant. 2. Stairs must have uniform risers and runs in any one flight 			
		The rise between successive treads must be between 125 mm and 180 mm			
		4. The run between successive steps must be between 280 mm and 355 mm			

- 5. Stairs must have closed risers
- 6. The maximum nosing projection on a tread must be no more than 38 mm, with no abrupt undersides.
- 7. Stairs must have high tonal contrast marking that extend the full tread width of the leading edge of each step
- 8. Stairs must be equipped with tactile walking surface Indicators that are built in or applied to the walking surface, and the tactile walking surface indicators must, i. Have raised tactile profiles,
 - ii. Have a high tonal contrast with the adjacent surface,
 - iii. Be located at the top of all flights of stairs, and
 - iv. Extend the full tread width to a minimum depth of 610 mm commencing one tread depth from the edge of the stair
- 9. Handrails must be included on both sides of stairs and must satisfy the requirements set out in paragraph 7 of subsection 80.24.
- 10. A guard must be provided that is not less than 920 mm, measured vertically to the top of the guard from a line drawn through the outside edge of the stairway nosing's and 1,070 mm around the landings and is required on each side of a stairway where the difference in elevation between ground level and the top of the stair is more than 600 mm but, where there is a wall, a guard is not required on that side.
- 11. Where stairs are more than 2,200 mm in width,
 - i. One or more intermediate handrails that are continuous between landings must be provided and located so there is no more than 1,650 mm between handrails, and
 - ii. The handrails must satisfy the requirements set out in paragraph 7 of subsection 80.24.

In collaboration with Redevelopment, Maintenance and Facilities and third party contractors compliance will be maintained by AODA standards when any renovations or new structure construction commences

Exterior paths of travel, curb ramps (AODA, 2005, O. Reg. 191/11, s. 80.26, O. Reg. 413/12 s. 6)	January 1, 2016	 Where a curb ramp is provided on an exterior path of travel, the curb ramp must align with the direction of travel and meet the following requirements: 1. The curb ramp must have a minimum clear width of 1,200 mm, exclusive of any flared sides. 2. The running slope of the curb ramp must, i. Be a maximum of 1:8, where elevation is less than 75 mm, and ii. Be a maximum of 1:10, where elevation is 75 mm or greater and 200 mm or less 3. The maximum cross slope of the curb ramp must be no more than 1:50 	In collaboration with Redevelopment, Maintenance and Facilities and third party contractors compliance will be
		4. The maximum slope on the flared side of the curb ramp must be no more than 1:10	maintained by AODA standards when any renovations or new
		 5. Where the curb ramp is provided at a pedestrian crossing, it must have tactile walking surface indicators that, i. Have raised tactile profiles, ii. Have a high tonal contrast with the adjacent surface, iii. Are located at the bottom of the curb ramp, iv. Are set back between 150 mm and 200 mm from the curb edge, v. Extend the full width of the curb ramp, and vi. Are a minimum of 610 mm in depth. 	structure construction commences
Exterior paths of travel, depressed curbs (AODA, 2005, O. Reg. 191/11, s. 80.27, O. Reg. 413/12 s. 6)	January 1, 2016	Where a depressed curb is provided on an exterior path of travel, the depressed curb must meet the following requirements: 1. The depressed curb must have a maximum running slope of 1:20	
		The depressed curb must be aligned with the direction of travel	

		 3. Where the depressed curb is provided at a pedestrian crossing, it must have tactile walking surface indicators that, i. Have raised tactile profiles, ii. Have high tonal contrast with the adjacent surface, iii. Are located at the bottom portion of the depressed curb that is flush with the roadway, iv. Are set back between 150 mm and 200 mm from the curb edge, and v. Are a minimum of 610 mm in depth. 	
Exterior paths of travel, accessible pedestrian signals (AODA, 2005, O. Reg. 191/11, s. 80.28, O. Reg. 413/12 s. 6)	January 1, 2016	 (1) Where new pedestrian signals are being installed or existing pedestrian signals are being replaced at a pedestrian crossover, they must be accessible pedestrian signals. (2) accessible pedestrian signals must meet the following requirements: 1. They must have a locator tone that is distinct from a walk indicator tone 2. They must be installed within 1,500 mm of the edge of the curb 3. They must be mounted at a maximum of 1,100 mm above ground level 4. The must have tactile arrows that align with the direction of crossing 5. They must include both manual and automatic activation features 6. They must include both audible and vibro-tactile walk 	No pedestrian crossovers on Brant Community Healthcare property (City property)
		indicators (3) where two accessible pedestrian signal assemblies are installed on the same corner, they must be a minimum of 3,000 mm apart	

		(4) Where the requirements in subsection (3) cannot be met because of the site constraints or existing infrastructure, two accessible pedestrian signal assemblies can be installed on a single post, and when this occurs, a verbal announcement must clearly state which crossing is active.	
Exterior pathways of travel, rest areas (AODA, 2005, O. Reg. 191/11, s. 80.28, O. Reg. 413/12 s. 6)	January 1, 2016	When constructing new or redeveloping existing exterior paths of travel that they intend to maintain, obligated organizations shall consult on the design and placement of rest areas along the exterior path of travel and shall do so in the following manner: 1. Shall consult with the public and persons with disabilities.	In collaboration with Re-development, Maintenance and Facilities and third party contractors compliance will be maintained by AODA standards when any renovations or new structure
Application, off-street parking (AODA, 2005, O. Reg. 191/11, s. 80.32, O. Reg. 413/12 s. 6)	January 1, 2016	Obligated organization shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this part	construction commences
Types of accessible parking spaces (AODA, 2005, O. Reg. 191/11, s. 80.34, O. Reg. 413/12 s. 6)	January 1, 2016	Off-street parking facilities must provide the following two types of parking spaces for the use of persons with disabilities: 1. Type A, a wider parking space which has a minimum width of 3,400 mm and signage that identifies the space as "van accessible" 2. Type B, a standard parking space which has a minimum width of 2,400 mm	
Access aisles (AODA, 2005, O. Reg. 191/11, s. 80.35, O. Reg. 413/12 s. 6)	January 1, 2016	 (1) access aisles, that is the space between parking spaces that allows persons with disabilities to get in and out of their vehicles, must be provided for all parking spaces for the use of persons with disabilities in off-street parking facilities (2) access aisles may be shared by two parking spaces for the use of persons with disabilities in an off-street parking facility and must meet the following requirement: 1. they must have a minimum width of 1,500 mm 2. they must extend the full length of the parking space 3. they must be marked with high tonal contrast diagonal lines, which discourages parking in them, where the surface is asphalt, concrete or some other hard surface 	In collaboration with Redevelopment, Maintenance and Facilities, parking spaces were revaluated in 2018 and re-established to ensure appropriate spaces available and signage visible

Minimum number and type of accessible	January 1,	(1) off-street parking facilities must have a minimum number of	
parking spaces (AODA,	2016	parking spaces for the use of persons with disabilities, in accordance with the following requirements:	
2005, O. Reg. 191/11, s. 80.36, O. Reg. 413/12 s.		1. One parking space for the use of persons with disabilities,	
6) 6)		which meets the requirements of a Type A parking space,	
		where there are 12 parking spaces or fewer.	
		2. 4% of the total number of parking spaces for the use of persons with disabilities, where there are between 13 and 100 parking spaces in accordance with the following ratio, rounding up to the nearest whole number:	
		i. Where even number of parking spaces for the use of persons with disabilities are provided in accordance with the requirements of this paragraph, an equal number of parking spaces that meet the requirements of Type A parking space and Type B parking space must be provided	In collaboration with Re-
		ii. Where an odd number of parking spaces for the use of persons with disabilities are provided in accordance with this paragraph, the number of parking spaces must be divided equally between parking spaces that meet the	development, Maintenance and Facilities, parking spaces were re- evaluated in 2018 and re-established to ensure appropriate spaces
		requirements of a Type A parking space and a Type B parking space, but the additional parking space, the odd numbered space, may be a Type B parking space.	available and signage visible
		3. one parking space for the use of persons with disabilities and	
		an additional 3% of parking spaces for the use of person with disabilities, where there are between 101 and 200 parking	
		spaces for the use of persons with disabilities, calculated in	
		accordance with ratios set out in subparagraphs 2i and 2ii,	
		rounding up to the nearest whole number.	
		4. two parking spaces for the use of person with disabilities and an additional 2% of parking spaces for the use of persons with	
		disabilities, where there are between 201 and 1,000 parking	
		spaces must be parking spaces for the use of persons with	
		Disabilities in accordance with the ratios set out in subparagraphs 2i and 2ii, rounding up to the nearest whole	
		number.	

		5. eleven parking spaces for the use of persons with disabilities and an additional 1% of parking spaces for the use of person with disabilities, where more than 1,000 parking spaces are provided must be parking spaces for persons with disabilities in accordance with the ratios set out in subparagraphs 2i and 2ii, rounding up to the nearest whole number. (2)If an obligated organization provides more than one off-street parking facility at a site, the organization shall calculate the number and type of parking spaces for the use of persons with disabilities according to the number and type of parking spaces required for each off-street parking facility. (3)In determining the location of parking spaces for the use of persons with disabilities that must be provided where there is more than one off-street parking facility at a site, the Organization may distribute them among the off-street parking facilities in a manner that provides substantially equivalent or greater accessibility in terms of distance from an accessible entrance or user convenience. (4)for purposes of subsection (3), the following factors may be considered in determining user convenience: 1. Protection from the weather 2. security 3. lighting 4. comparative maintenance	In collaboration with Redevelopment, Maintenance and Facilities, parking spaces were revaluated in 2018 and re-established to ensure appropriate spaces available and signage visible
Signage (AODA, 2005, O. Reg. 191/11, s. 80.37, O. Reg. 413/12 s. 6)	January 1, 2016	Obligated organizations shall ensure that parking spaces for the use of persons with disabilities are required under section 80.36 are distinctly indicated by erecting an accessible permit parking sign in accordance with section 11 of Regulation 581 of the Revised Regulations of Ontario, 1990	
On-street parking spaces (AODA, 2005, O. Reg. 191/11, s. 80.38, O. Reg. 413/12 s. 6)	January 1, 2016	 (1) when constructing or redeveloping existing on-street parking spaces, designated public sector organization shall consult on the need, location and design of accessible on street parking spaces and shall do so in the following manner: 1. designated public sector organizations must consult with the public and persons with disabilities 	

Application (AODA, 2005, O. Reg. 191/11, s. 80.40, O. Reg. 413/12 s. 6)	January 1, 2016	 (1) obligated organizations shall meet the requirements set out in this Part in respect to the following: 1. all newly constructed service counters and fixed queuing guides 2. all newly constructed or redeveloped waiting areas 	
		(2) for the purposes of the Part, requirements for obtaining services in respect of service counters, fixed queuing guides and waiting areas apply whether the services are obtained in buildings or out-of-doors	
Service counters (AODA, 2005, O. Reg. 191/11, s. 80.41, O. Reg.	January 1, 2016	(1) when constructing new service counters, which includes replacing existing service counters, the following requirements must be met:	

Part VI – Built Environment Standard						
Regulation Section	Compliance Date	Requirements	Action			
413/12 s. 6)		 There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters. the service counter that accommodates mobility aids must meet the following requirements: the countertop height must be such that it is usable by a person seated in a mobility aid There must be sufficient knee clearance for a person seated in a mobility aid, where forward approach to the counter is required. the floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid 	Accessible counters available with future goal of re-working areas at:			

Fixed queuing guides (AODA, 2005, O. Reg. 191/11, s. 80.42, O. Reg. 413/12 s. 6)	January 1, 2016	When constructing new fixed queuing guides, the following requirements must be met: 1. the fixed queuing guides must provide sufficient width to allow for the passage of mobility aids and mobility assistive devices 2. the fixed queuing guides must have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction 3. the fixed queuing guides must be cane detectable	
Waiting areas (AODA, 2005, O. Reg. 191/11, s. 80.43, O. Reg. 413/12 s. 6)	January 1, 2016	 (1) When constructing a new waiting area or redeveloping an existing waiting area, where seating is fixed to the floor, and a minimum of 3% of the new seating must be accessible, but in no case shall there be fewer than one accessible seating space. (2) for the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait 	No fixed seating, all moveable and can be arranged for accessibility
Maintenance of accessible elements (AODA, 2005, O. Reg. 191/11, s. 80.44, O. Reg. 413/12 s. 6)	January 1, 2016	In addition to the accessibility plan requirements set out in section 4, obligated organizations shall ensure that their multiyear accessibility plans include the following: 1. procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part, 2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.	Brant Community Healthcare will collaborate with the following stakeholders: • Environmental Services; and Maintenance, Facilities and Engineering to ensure procedures are implemented and maintained