

Huron Perth Healthcare Alliance		
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Accessibility: Persons with Disabilities	Review/Effective Date:	June 26, 2023
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Scope

This policy applies to all staff, students, physicians and volunteers at the Huron Perth Healthcare Alliance (HPHA).

Policy

Through accessibility planning and with the guidance of the Accessibility Committee, the Huron Perth Healthcare Alliance (HPHA) will strategically identify, remove and prevent as many barriers as possible for persons with disabilities. HPHA is committed to the continual improvement of access for all those with disabilities, and will welcome all persons to our hospitals and service locations by providing access to goods and services that respect the independence, dignity, integration and equal opportunity of persons with disabilities. HPHA understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Purpose

The purpose of this policy is to be responsive to an individual's needs in a manner that protects their dignity and enables persons with disabilities to increase their independence and provides access to our goods and services.

Definitions:

Disability, as per the *Accessibility for Ontarians with Disabilities Act* and the *Human Rights Code*, means:

- a. Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b. A condition of mental impairment or a developmental disability;
- c. A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d. A mental disorder; or
- e. An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*.

Persons with Disabilities: Individuals who have a disability as defined under the *Accessibility for Ontarians with Disabilities Act* and the *Human Rights Code* (and above)

Service Animal:

- (a) The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- (b) The person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - (i) A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - (ii) A member of the College of Chiropractors of Ontario.
 - (iii) A member of the College of Nurses of Ontario.
 - (iv) A member of the College of Occupational Therapists of Ontario.
 - (v) A member of the College of Optometrists of Ontario.
 - (vi) A member of the College of Physicians and Surgeons of Ontario.
 - (vii) A member of the College of Physiotherapists of Ontario.
 - (viii) A member of the College of Psychologists of Ontario.
 - (ix) A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. O. Reg. 165/16, s. 16.

Support Person: In relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

Assistive Devices: Any devices used by persons with disabilities to help with daily living and tasks such as auxiliary aids, communication aids, cognition aids, personal mobility aids and medical aids. Assistive devices include a range of products such as wheelchairs, walkers, white canes, crutches, oxygen tanks, and hearing aids and other electronic communication devices.

Procedure:**Assistive devices**

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

HPHA will ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by persons with disabilities while accessing our goods, services or facilities.

Communication

HPHA will communicate with people with disabilities in ways that take into account their disability. This may include the following methods of communication:

- Verbal
- Written
- Electronic

HPHA will work with the person with a disability to determine what method of communication works for them.

Service animals

We welcome people with disabilities and their service animals. Service animals are allowed in the areas of our premises that are open to the public.

When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional for the purposes of this policy is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

Service Animals are not permitted where sterile procedures occur in accordance with the *Health Promotion and Protection Act*. This includes but is not limited to:

- Operating Rooms
- Birthing Rooms
- Minor procedure rooms or rooms where sterile interventional procedures are occurring
- Rooms in which transmission based precautions are in place (isolated rooms)

Only service dogs are allowed by law in areas where food is prepared, handled, served and sold. All other types of service animals are excluded.

Support persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises as long as it does not involve a health and safety risk.

In cases where confidentiality is important due to the nature of information being discussed, the support person may be required to sign a confidentiality agreement. Before discussing confidential information, staff must seek the consent of the person with a disability.

Notice of temporary disruption

In the event of a planned or unexpected disruption to services or facilities for persons with disabilities, HPHA will notify customers promptly. Clearly posted service disruption notices will include:

- information about the reason for the disruption,
- the anticipated duration,
- a description of any available alternate services.

HPHA recognizes each situation is unique and may require unique alternatives.

When a disruption is known in advance or planned, a notice of disruption of service will be posted two weeks prior to disruption. Notifications must include:

- Reason for and information about the disruption
- Anticipated duration
- Alternative facilities or services if available
- Contact name and number for information relating to the service interruption

Interruption Level	Action (to be initiated by Manager of affected area)
<p>Level 1 :</p> <p>Minimal interruption/delay of access, for example:</p> <ul style="list-style-type: none"> • Where other options are available (e.g. one elevator out of service when other elevators are still in service) • Computer downtime 	<ul style="list-style-type: none"> • Notify Facilities Management to place appropriate signage within facility • Send broad notification to all staff via e-mail • Notify Volunteer Services if volunteer assistance is required
<p>Level 2 :</p> <p>Moderate disruption/delay of access, for example:</p> <ul style="list-style-type: none"> • Access point disruption <ul style="list-style-type: none"> ○ e.g. Construction at parking lot entrance disrupts access to parking lot • Short term disruptions lasting less than 7 days • Service interruption where no alternative exists (e.g. elevator between the main floor and Surgical Ambulatory Clinic) 	<ul style="list-style-type: none"> • Notify Facilities Management to place appropriate signage within facility • Send broad notification to all staff via e-mail • Notify Volunteer Services if volunteer assistance is required • Notify Manager Peri-Operative Services if additional porter resources to help transport patients/visitors to alternative entrances/resources are required • Notify Senior Administrator who will determine if additional communication such as postings on external/internal websites or signage/paid advertising is required
<p>Level 3:</p> <p>a) Planned large scale interruption which may impede access to building/service, for example:</p> <ul style="list-style-type: none"> • Any interruption longer than 7 days (e.g. construction/ renovation/repair of facility) • Planned disruption with greater than 2-week notice (e.g. Hospital specific statutory holidays) <p>b) Abrupt large term disruption of service, for example:</p>	<ul style="list-style-type: none"> • Notify Facilities Management to place appropriate signage within facility • Send broad notification to all staff via e-mail • Notify Volunteer Services if volunteer assistance is required • Notify Manager Peri-Operative Services if additional transporters to help transport patients/visitors to alternative entrances/resources are required • Notify Senior Admin who will determine if additional communication such as postings on external/internal websites or signage/paid advertising is required

<ul style="list-style-type: none"> • Pandemic disruption of all services • Telephone disruption • Epidemic/pandemic that closes specific units or the entire hospital to outside access from visitors. May include closure of outpatient services. 	<ul style="list-style-type: none"> • Director of Facilities Management to coordinate alternative service location with appropriate notification (if possible)
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Other potential actions for any level of interruption (to be considered and implemented at the discretion of the Senior Administration or the Administrator on Call):

- Notice on website
- Notice on exterior signage
- Update of telephone messaging system
- Notification in newspapers and broadcast media
- Use of additional porters
- Use of additional volunteers

Training

HPHA will provide training on accessible customer service, other Ontario’s accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities to:

- all employees and volunteers
- anyone involved in developing our policies
- anyone who provides goods, services or facilities to individuals on our behalf.

Staff will be trained on accessible customer service within one month after being hired.

Training will include:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard
- HPHA’s policies related to the customer service standard
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- what to do if a person with a disability is having difficulty accessing HPHA’s goods, services or facilities

Staff will also be trained when changes are made to our accessible customer service policies.

HPHA will maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Feedback process

HPHA welcomes feedback on how we provide accessible customer service. Feedback will help us identify barriers and respond to concerns.

Patients and Caregivers will be notified of how to provide feedback in the

- following ways:
- Website
 - Patient & Family Experience Survey

Customers who wish to provide feedback regarding how HPHA provides goods, services or facilities to people with disabilities can provide feedback in the following way(s):

- Email
- Telephone
- Letters
- Patient & Family Experience Survey (available on HPHA website)

All feedback, including complaints, will be handled in the following manner:

Feedback received through HPHA's Patient & Family Experience Survey is directed to the Patient Experience Office that enters them into the RL Feedback database. All feedback is forwarded to the appropriate leader for action.

Complainant to be kept informed

As per the *Excellent Care for All Act*, "where a complaint has been made by a patient or a caregiver of a patient, the organization shall ensure that the complainant is informed of the status of the review of the complaint,

- (a) **within five days from the day the complaint is received by the organization**; and
- (b) whenever the complainant reasonably requests further information."

HPHA will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Notice of availability of documents

HPHA notifies the public, via our website, that documents related to accessible customer service are available upon request. HPHA will provide documents in an accessible format or with communication support upon request. HPHA will consult with the person making the request to determine the suitability of the format or communication support and the requested information will be provided in an accessible format in a timely manner at no additional cost.

Procurement

HPHA will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks. If it is not possible and or practical to do so, an explanation will be provided upon request.

Information and Communications

HPHA has a process for receiving and responding to feedback. This process is accessible to persons with disabilities upon request. HPHA commits to communicating with people with disabilities in ways that take into account their disability. Upon request, HPHA will provide information about our organization and services, including public safety information, in accessible formats and / or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons

HPHA will consult with the person making the request in determining the suitability of an accessible format or communication support. If HPHA determines that information or communications are not able to be converted, HPHA shall provide the requestor with:

- a) an explanation as to why the information or communications are not able to be converted; and
- b) a summary of the requested information or communications

The public is notified of the availability of accessible formats and communication supports via the HPHA website.

HPHA's website meets internationally-recognized We Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Employment

HPHA notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. Job applicants are notified when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. HPHA consults with the applicants and arranges for suitable accommodation.

HPHA notifies successful applicants of policies for accommodating employees with disabilities when making offers of employment.

HPHA notifies staff that supports are available for those with disabilities as soon as possible after they begin their employment. Updated information is provided to employees whenever there is a change to existing policies on the provision of job accommodation that takes into account an employee's accessibility needs due to a disability.

HPHA consults with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. HPHA will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace

Where needed, HPHA will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, workplace emergency information will be provided to a designated person who is providing assistance to that employee during an emergency.

HPHA will provide the information as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

HPHA will 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.

HPHA has a written process to develop individual accommodation plans for employees. Individual accommodation plans will:

- a) if requested, include any information regarding accessible formats and communications supports provided
- b) if required, include individualized workplace emergency response information; and
- c) identify any other accommodation that is to be provided

HPHA has a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Design of Public Spaces

HPHA will meet accessibility laws when building or making major changes to public spaces that include:

- Service-related elements such as service counters, fixed queueing lines and waiting areas

Changes to Existing Policies

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.

REFERENCES:

- Association for professionals in infection control and epidemiology, inc. Volume II: Scientific & Practice Elements. 2nd Edition. January 2005. p. 67-5.
- *Food and Safety and Quality Act*, 2001
- *Health Protection and Promotion Act*, RSO 1990. Ontario Regulation 562.
- Ontario Regulation 191-11 Integrated Accessibility Standards
- Ontario Human Rights Code
- www.ontario.ca
- www.accessforward.ca