

Huron Perth Healthcare Alliance	
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Accessible Customer Service	Review/Effective Date: April 05, 2019
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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 those persons with disabilities. The HPHA is committed to the continual improvement of access for all those with disabilities, and will welcome all persons to our hospitals by providing access to goods and services that respect the independence, dignity, integration and equal opportunity of persons with disabilities.

Purpose:

The purpose of this policy is to provide HPHA staff with guidelines to be responsive to an individual's needs in a manner that protects their dignity and respect, 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: Are 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, through 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: “support person” means, 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: are 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, 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 staff are trained and familiar with various assistive devices that are available on site or that are provided that may be used by customers with disabilities while accessing HPHA goods, services or facilities.

Communication

HPHA will communicate with people with disabilities in ways that take into account their disability and will respond to requests as possible. This may include the following:

- Verbal
- Written
- Electronic

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

Service Animals

HPHA welcomes the service animals of people with disabilities. Service animals are allowed in the parts of the premises that are open to the public.

If an animal cannot easily be identified as a service animal, 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 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, HPHA will do the following to ensure people with disabilities can access 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* and include but are 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. The presence of service animals is managed differently than visitation by an individual's pet as detailed in the [HPHA Animal Visit](#) policy.

Support persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on HPHA's premises as long as their presence does not pose 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 of services

Ensure notices are conspicuous and are provided in the most appropriate medium for the service disruption (i.e. displayed at the location of the disruption, on HPHA website, on HPHA digital signs, notifying known patients/persons in advance). When a disruption is known in advance or planned, a notice of disruption of service will be posted 2 weeks prior to disruption whenever possible.

Service disruption notices will include:

- information about the reason for the disruption,
- the anticipated duration,
- a description of any available alternate services.
- contact name and number for information relating to the service interruption

Recognize each situation is unique and may require unique alternatives.

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 	<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 Administration who will determine if additional communication such as postings on external/internal websites or digital signage/paid advertising is required
<p>Level 3:</p> <p>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 stat holidays) <p>Abrupt large term disruption of service, for example:</p> <ul style="list-style-type: none"> ● Pandemic disruption 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"> ● 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 Administration who will determine if additional communication such as postings on external/internal websites or digital signage/paid advertising is required ● Director of Facilities Management to coordinate alternative service location with appropriate notification (if possible)

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 transporters
- Use of additional volunteers

Training

HPHA will provide accessible customer service training to:

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

Staff will be required to complete their training 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 in accessing HPHA's goods, services or facilities

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

Feedback process

HPHA welcomes feedback regarding provision of accessible customer service. Customer feedback will help the organization identify barriers and respond to concerns.

Customers who wish to provide feedback can do so in the following ways:

- Email
- Telephone
- Letters
- Patient & Family Experience Survey
- HPHA website

All feedback, including complaints, will be handled as outlined in the [HPHA Management of Patient Experience Feedback](#) policy. HPHA's feedback process will be accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Notice of availability of documents

HPHA will provide requested documents in an accessible format or with communication support, on request. HPHA will consult with the person making the request to determine the suitability of the format or communication support and will provide the accessible format in a timely manner and, at no additional cost.

References:

- *Health Protection and Promotion Act*, RSO 1990. Ontario Regulation 562.
- *Food and Safety and Quality Act*, 2001
- Ontario Regulation 191-11 Integrated Accessibility Standards
- Ontario Human Rights Code
- www.ontario.ca
- www.accessforward.ca