



Corporate Policy Title Page

POLICY NAME: Accessibility Policy	
POLICY NUMBER: 00341	Date of latest revision: 2017-12-13
ORIGINATING DEPARTMENT: Accessibility and Interpretation Services	Responsible VP: Renee Legare, Executive Vice President & Chief Human Resources Officer
<input type="checkbox"/> New Policy <input checked="" type="checkbox"/> Revised Policy	
Policy Background or Rationale: (Is there a story, incident or legislation driving this policy?) <p>This policy complies with the Accessibility for Ontarians with Disabilities Act (AODA 2005), Its content is a commitment on the part of The Ottawa Hospital to make their services, products and employment opportunities fully accessible for staff, volunteers and / or patients with disabilities.</p> <p>Following the provincial review of the Customer Service Regulations under the AODA 2005, we were required to update our policy to reflect the changes.</p>	
Scope of Policy: (who will it impact most) <p>This revised Policy will greatly enhance the level of accessibility for persons with disabilities when they come to The Ottawa Hospital to work, volunteer, to receive compassionate care and or when a family member / friend visits their loved ones.</p>	
Key Messages for Staff: (top points managers need to tell staff now) <p>The TOH Accessibility Policy has recently been updated to reflect changes on the Accessibility for Ontarians with Disabilities Act (AODA 2005). The changes include our obligation to provide customer service training to all employees including those without direct contact with patients.</p> <p>As per previous directives, patients who came to the hospital with a service animal needed to provide proof that the animal was trained by a certified school. Now, patients may instead simply carry a letter from specific health care professionals endorsing their need for a service animal.</p>	
Contact for Questions or Inquiries	
Name: Serge Falardeau, Coordinator Accessibility and Interpretation Services	Extension or email: sfalardeau@toh.ca

CORPORATE POLICIES AND PROCEDURES
ACCESSIBILITY POLICY
No.: 00341
(Formerly ADMVIII640)

ISSUED BY: Executive Vice President &
Chief Human Resources Officer

DATE OF APPROVAL: January 24,
2018

APPROVED BY: Senior Management
Committee

LAST REVIEW/REVISION DATE:
2013/08/09, 2017-12-13

CATEGORY: Communications

IMPLEMENTATION DATE: 2012/12/17

POLICY STATEMENT:

1. The Ottawa Hospital (TOH) is committed to providing equal treatment to people with disabilities with respect to the use and benefit of Hospital services, programs, goods and facilities. TOH is committed to giving people with disabilities the same opportunity to access its services and to allowing them to benefit from the same services, in the same place and in similar ways as other patients/clients. This commitment extends to patients, families, visitors, employees and volunteers with visible or non-visible disabilities.
2. TOH will comply with the Accessibility for Ontarians with Disabilities Act, 2005. TOH combines all of the requirements of the AODA Accessible Standards for Customer Service Regulation with the requirements of AODA Integrated Accessibility Standards Regulation in the creation of this Accessibility Policy.
3. TOH will establish policies, practices and procedures on eliminating barriers and providing services and supports to people with disabilities. These will be consistent with the core principles of independence, dignity, integration and equality of opportunity.
4. Documentation that describes this policy and each of its requirements shall be maintained on the TOH public website and provided to individuals upon request in the appropriate format or with communication support.

This policy applies to all TOH employees, volunteers and any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of TOH in accordance with the legislation. TOH shall have in place an Accessibility Committee for the purpose of monitoring the implementation of the *Accessibility for Ontarians with Disabilities Act (AODA 2005)*, preparing a TOH Multi-Year Accessibility Plan, providing updates related to sections of the Integrated Accessibility Standards Regulation (IASR) and other accessibility related initiatives. The Committees' membership will consist of representatives from different departments of TOH and community organizations / individuals who represent people with disabilities

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5. TOH shall produce a multi-year Accessibility Plan, in consultation with persons with disabilities. The plan will be posted on the hospital's website and shall be made available in an accessible format and with communication supports, upon request. Progress on the plan will be provided on the schedule determined by the AODA legislation. The plan and subsequent progress reports will be approved by Senior Management and presented to the Board of Governors.
6. TOH maintains and develops policies on how TOH will meet its requirements under the AODA and will provide such policies in an accessible format upon request.
7. When procuring goods, services, self-service kiosks or facilities, the hospital shall incorporate accessibility criteria and features, unless it is not feasible (practicable). If not practicable, the hospital shall provide an explanation, upon request.

DEFINITION(S):

1. **Barrier:** Anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an attitudinal barrier, technological barrier, a policy or a practice.
2. **Disability:**
 - i. 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 co-ordination, 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 remedial appliance or device.
 - ii. a condition of mental impairment or a developmental disability,
 - iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - iv. a mental disorder, or
 - v. an injury or disability for which benefits were claimed or received under the insurance plan established under the [Workplace Safety and Insurance Act, 1997](#).
3. **Assistive Devices:** Any piece of equipment or device used to maintain or promote function in someone with a disability. Can range from low (e.g., walking stick) to high (e.g., computerized communication device).
4. **Guide Dog:** Guide dog is defined in section 1 of the [Blind Persons' Rights Act](#) and means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulation.
5. **Service Animal:** An animal described in subsection 4(9) of the Accessibility Standards for Customer Service. An animal is a service animal for a person with a disability

- i. if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - ii. if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.
- 6. 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 and services.
- 7. Accessible Formats:** may include but are not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.
- 8. Communication Supports:** may include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- 9. Kiosk:** is an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

ALERTS: N/A

OUR COMMITMENTS:

1. Customer Service Standard Procedures

i. COMMUNICATION

- TOH will communicate with persons with a disability taking into account their disability. TOH will work with people with disabilities to determine what method of communication works for them.
- Telephone services: TOH is committed to providing fully accessible telephone services to our patients/clients.
- TOH will offer to communicate with patients/clients by e-mail, TTY, and/or relay services if telephone communication is not suitable to their communication needs or is not available.
- TOH is committed to providing accessible invoices and or other documents to all of its patients/clients. For this reason, invoices and or other documents will be provided in the following formats upon request: Hard copy, large print or email. TOH will answer any questions patients/clients may have about the content of the invoice in person, by telephone or email.
- Information about TOH's feedback process will be available to the public. Feedback and or complaint regarding the way TOH provides services to people with disabilities can be made by email (patientadvocacy@toh.ca) verbally or by phone (613-798-5555 ext. 13377) and/or feedback card. TOH will respond to this feedback and take appropriate action.
- Feedback / complaints will be responded to within 5 days

ii. TRAINING

TOH will provide both customer service training and targeted training in an accessible format in order to ensure that everyone is familiar with the expectations and requirements under the AODA and the Ontario Human Rights Code. Training will be provided to all employees and volunteers, anyone involved in developing our policies and anyone who provides goods, services or facilities to patients on our behalf.

Training will be provided prior to the employee's or volunteer's start date or shortly thereafter. The names of the employees and volunteer who received the training will be kept in order to ensure that compliances under the IASR are met. Training will include:

- Purpose of the Accessibility for Ontarians with Disabilities Act (2005) and the requirements of the customer service standards
- TOH'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 requires the assistance of a service animal or a support person
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- What to do if a person with a disability is having difficulty accessing TOH's goods, services or facilities.

Changes to the Accessibility Policy / customer services will be posted on both the external and internal website. Staff / volunteers affected by the changes will be notified by way of an article in TOH's newsletter, journal or by internal correspondence and will receive the necessary training accordingly.

iii. ASSISTANCE

Assistive Devices – Person 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.

Guide Dog & Service Animals - Persons with disabilities are permitted to be accompanied by their guide dog or service animal in those areas of TOH open to the public, unless such animal is excluded by another law. If excluded by law, the patient will be notified of the reason for the exclusion of the animal and other measures will be used to provide services to the person with a disability.

A guide dog and 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.

When the animal cannot be easily identified as a guide dog or service animal, a TOH staff may ask the owner of the animal to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons related to their disabilities. The letter can originate from a member 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

A guide dog or service animal can be used by individuals who are blind, have autism, mental health issues, physical or dexterity disabilities to name a few.

If the guide dog or service animal is causing any safety or hygiene problems for staff or patients, the hospital may ask that the dog be removed.

If a patient who uses the services of a guide dog or service animal is to be admitted at the hospital, the patient must make arrangement for someone to care for it outside of the hospital property.

Support Person - People with a disability who use a support person are entitled to bring that person with them while accessing services at TOH. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on TOH premises

In certain cases, TOH might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability or others on the premises.

Before making a decision, TOH will consult with the person with a disability to understand their needs, consider the health and safety reasons based on available evidence and then determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

iv. NOTICE OF SERVICE DISRUPTION

Notice will be provided, where possible, when facilities or services that persons with a disability rely on are temporarily disrupted. Such notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. The notice will be placed at all public entrances and service counters on TOH premises.

2. Information and Communication Standards Procedures

i. ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Except as otherwise provided by the AODA, the hospital shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities in accordance with the schedule set out in the AODA Integrated Standards Regulation. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons

ii. TERMINOLOGY

When referring to people with disabilities, TOH employees, volunteers and third party contractors shall use terminology that adheres to guidelines provided in TOH's Accessibility Guide available on myHospital (internal website).

iii. ACCESSIBLE WEBSITES AND WEB CONTENT

Internet websites and web content controlled directly by the Ottawa Hospital or through a contractual relationship that allows for modification of the product shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

iv. EMERGENCY PROCEDURES, PLANS AND INFORMATION

If the information is made public, The Ottawa Hospital shall provide all existing public emergency procedures, plans and public safety information, upon request in an accessible format or with appropriate communication supports in a timely manner.

3. Employment Standards

i. RECRUITMENT

The Ottawa Hospital shall post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. TOH shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants shall be notified about the hospital's policies for accommodating employees with disabilities as part of their offer of employment.

ii. EMPLOYEE SUPPORTS

The Ottawa Hospital will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to

disability. TOH will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

iii. ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR EMPLOYEES

Upon an employee's request, TOH 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.

TOH will consult with the employee making the request in determining the suitability of an accessible format or communication support.

iv. WORKPLACE EMERGENCY RESPONSE INFORMATION

If an employee's disability is such that workplace emergency response information is necessary and TOH is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo a review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when TOH reviews its general emergency response plan.

v. DOCUMENTED INDIVIDUAL ACCOMODATION PLANS

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communications supports. If requested, the plans shall include individualized workplace emergency response information.

vi. RETURN TO WORK PROCESS

TOH shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process shall outline the steps that the hospital shall take to facilitate the return to work.

4. Transportation Standards

i. ACCESSIBLE SHUTTLE

TOH will provide accessible transportation services for employees between campuses. In the event that vehicles are not accessible, TOH will provide equivalent transportation services (i.e. in the form of accessible taxicabs).

5. Responsibility and Monitoring

- i. The Accessibility and Interpretation Services' (A-IS) office is responsible for reviewing this Policy annually and recommending amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.
 - The A-IS office shall provide advice and direction on the implementation of this Policy
 - Managers and Directors shall ensure that they and their staff are familiar with and comply with this Policy.
- ii. The failure to comply with the AODA regulations can result in enforcement measures and/or financial penalties levied by the Province of Ontario. Managers and Directors shall monitor current practices to ensure compliance.

RELATED POLICIES / LEGISLATION:

1. Corporate - Administration Policy # 00325 – Patient & Community Relations - Pet Visitation, Pet Therapy and Assistance Animals in The Hospital (available upon request)
2. TOH Accessibility Guide
3. TOH Accessibility Plan
4. [The Ontarians with Disabilities Act \(ODA\), September 2001.](#)
5. The Ontario Government site at www.ontario.ca/en/help/STEL01_100996
6. [The Accessibility for Ontarians with Disabilities Act \(AODA\), 2005, S.O. 2005. c. 11](#)
7. [Integrated Accessibility Standards Regulations \(IASR\), O. Reg. 191/11](#)
8. [Human Rights Code, R.S.O. 1990, c. H. 19](#)
9. [The Blind Persons' Rights Act](#)
10. *Guide to the Accessibility Standards for Customer Service*, Ontario Regulation 429/07

REFERENCES: N/A

COMMENTS / SIGNIFICANT REVISIONS: N/A