

<b>SUBJECT:</b>	<b>ACCESSIBILITY</b>	<b>NUMBER:</b>	<b>1.1</b>
APPLIES TO:	All Staff, Physicians and Volunteers	NEW/REVISED:	REVISED
AUTHORIZED BY:	Chief Executive Officer	APPROVAL DATE:	January 2021
CATEGORY:	Administrative	PAGE:	1 of 6

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## **POLICY**

Sault Area Hospital (SAH) is committed to preventing, identifying and removing barriers that impede the ability of people with disabilities to access care and services. This includes patients, families, staff, physicians, volunteers and members of our community.

In June, 2005 the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA). The purpose of this enhanced Act is to develop, implement and enforce standards of accessibility for all Ontarians. SAH's Accessibility Policy is consistent with the AODA, the Accessibility Standards for Customer Service, Ontario Regulation (O. Reg. 429/07) that was passed on January 1, 2008, and the *Integrated Accessibility Standards* (O. Reg. 191/11) passed on July 1, 2011.

These regulations set accessibility standards related to customer service, information and communication, employment, transportation and the design of public spaces. All public sector organizations, including Sault Area Hospital (SAH), are required to comply with the requirements as applicable. All people, regardless of disability, have equal right of access to all goods, services and facilities provided by SAH. SAH is committed to:

- Providing goods, services and facilities in a manner that:
  - Maintains the dignity, autonomy, respect, privacy and safety of persons with disabilities; and
  - Is inclusive, sensitive and responsive to unique needs.
- Integration and equal opportunity;
- Preventing and removing barriers to accessibility; and
- Meeting the standards set out under the *Accessibility for Ontarians with Disabilities Act, 2005*.

## **PURPOSE**

The purpose of this policy is to outline practices and procedures in place at SAH to help identify and remove barriers that impede a person's ability to access care and services.

## **DEFINITIONS**

### **Assistive Devices and Measures:**

Assistive devices and measures are supports to improve access to care for patients with disabilities. For example, wheelchairs, volunteers, real-time captioning services (on-screen typing of what speakers are saying), sign language interpreters or deaf-blind interveners. Other examples

include, text, Telephone Teletypes (TTY) to communicate with clients who are deaf, hard of hearing, have speech impairments or are deaf-blind (Guide to the Accessibility Standards for Customer Service, Ontario Regulation).

## **Disability**

According to the Ontario Human Rights Code, a "Disability" is defined as:

- 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 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 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, 1997.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go. This definition describes common disabilities and is not considered exhaustive.

## **Emotional Support Animals**

Emotional support animals provide comfort and security; however, they do not have training for specific tasks. Therefore, emotional support animals do not formally qualify as service animals under the AODA.

At SAH, an Emotional Support Animal will be considered a "service animal" if the patient/visitor provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability (see SAH's Service Animal Administrative Policy) and at the discretion of the area manager or delegate based on a risk analysis.

## **Personal Assistive Devices:**

For the purpose of this policy, Personal Assistive Devices are personal supports used by persons with disabilities that enable them to carry out the activities of daily living and allow access to services. Patient-owned equipment such as power-mobility devices (power wheelchairs or scooters) are regarded as Personal Assistive Devices.

## **Service Animals:**

**Service Animal:** Any animal individually trained to assist people with disabilities in the activities of normal daily living, to enhance quality of life, and mitigate their disabilities. These animals provide persons living with disabilities a variety of services, including but not limited to:

- guiding individuals with visual impairments

- alerting individuals who are deaf, deafened or hard of hearing to sounds
- alerting to seizures
- opening/closing doors
- retrieving items
- pulling a wheelchair

Most service animals are dogs and can be of any breed or size. A service animal is afforded access to all places the public is invited when accompanying their human partner. A service animal is not considered a “pet” because it is specially trained to help a person overcome the limitations of their disability or used to minimize the impacts of the disability. (See SAH’s Service Animal Administrative Policy)

### **Support Person:**

A "Support Person" accompanies a person with a disability, in order to help with communication, mobility, personal care or medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure. A Support Person may be a paid professional, a volunteer, family member or friend of the person with a disability (Guide to the Accessibility Standards for Customer Service, Ontario Regulation).

## **PROCEDURE AND COMPLIANCE**

SAH will ensure we are identifying, preventing and removing barriers to access for people with disabilities through procedures in the following areas:

### General Procedures

- Enabling and accommodating people with disabilities to access our goods and utilize our services.
- Communicating with a person with a disability in a manner that takes into account his or her disability.

### **Support Persons, Service Animals and Assistive Devices**

Support and encourage the presence and use of accessibility support persons, service animals and assistive devices are embraced with consideration taken for infection control and patient safety (for example, kitchen areas and OR suites).

- Allowing people with disabilities to bring their guide dog or service animal with them to areas of the premises that are open to the public.
- Permitting people with disabilities who use a support person to accompany them and ensuring that a person with a disability has access to his or her support person while on our premises.
- Encouraging people with disabilities to use their own personal assistive devices to improve access to SAH's goods and services.

### **Training**

- Ensuring anyone who provides goods, services or facilities on behalf of Sault Area Hospital, including all staff, physicians and volunteers, will receive accessibility awareness training about key principles and accessibility strategies and tools (i.e. e-Learning module). This training will include:
  - The purpose and content of the *Accessibility for Ontarians with Disabilities Act, 2005*, the *Accessibility Standards for Customer Service (O. Reg. 429/07)*, the *Integrated*

*Accessibility Standards* (O. Reg. 191/11) and Ontario's *Human Rights Code* as it pertains to persons with disabilities;

- The purpose and content of policies and procedures governing accessibility at SAH;
- An introduction to some of the equipment and assistive devices available for use at SAH when providing services to persons with disabilities;
- Considerations and strategies to promote accessible information sharing and communication; and
- Records will be kept to document training of employees and volunteers.

### **Notice of Accessible Service Interruption**

SAH will provide notice when facilities or services that people with disabilities rely on to access our services are temporarily disrupted. In the event of a planned service disruption, notification will be provided in advance or as soon as possible. When necessary, appropriate alternative services will be provided. In the event of unplanned service disruption, notification will be provided as soon as possible after the disruption occurs. When necessary, appropriate alternative services will be provided. Notices of disruption shall be made publicly available as appropriate (e.g. SAH website) and shall include:

- The name of the event/service;
- The normal service location being impacted;
- Alternate service locations;
- Alternate service methods;
- Hours of service availability;
- Contact information; and
- Any other information deemed appropriate to deliver a good or service.

### **Encouraging Feedback**

SAH encourages and responds to feedback from patients, families and visitors. The hospital accepts feedback in a variety of formats, including email, telephone, mail and in-person. In addition, SAH will ensure:

- Communication supports are available to facilitate the feedback process upon request.
- Every staff member is attentive to the concerns of patients/residents, their families and visitors and to resolve concerns related to accessibility. There are a number of strategies that are available to patients/ families/ staff and physicians to provide feedback regarding accessibility.
- All information provided through our feedback process is available in accessible formats upon request. Upon being advised of a need for documents in accessible formats or communication supports, SAH will work with the individual making the request to determine the most appropriate format or communication support. Where information cannot be converted to the format requested, SAH will provide an explanation of the problem and a summary of the information.

Concerns related to accessibility shall be reported to Patient Relations and managed in accordance with the *Patient and Visitor Concerns Management Policy*.

## **Accessibility Committee and Accessibility Plan**

- SAH, in consultation with persons with disabilities, will establish and maintain a multi-year accessibility plan.
- This Plan will be reviewed and updated at least once every 5 years.
- Each year, SAH will prepare a status report of the measures taken to implement the strategies set out in the multi-year accessibility plan.
- Both the multi-year accessibility plan and the annual status reports will be made publicly available through the SAH website.

## **Procurement**

- SAH considers accessibility when making decisions relating to the procurement or acquisition of goods, services and facilities.
- In particular, SAH will incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

## **Hiring and Recruitment**

- *Ensuring that all open positions are recruited for in an inclusive manner, ensuring equal consideration and that accommodation is available in accordance with the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005*

Use the following language in job postings:

“Sault Area Hospital is a respectful, caring, and inclusive workplace. We are committed to championing accessibility, diversity, equal opportunity and maintaining a barrier-free selection process for job applicants. Requests for accommodation can be made at any stage of the recruitment process providing the applicant has met the requirements for the open position. Applicants need to make their requirements known to the Human Resources department when contacted. All requests are handled confidentially.”

## **RELATED POLICY & LAW**

1. *Patient and Visitor Concerns Management (Administrative Policy 2.6)*
2. *Service Animal (Administrative Policy 1.9)*
3. *Accessibility for Ontarians with Disabilities Act, 2005*
4. *Guide to the Accessibility Standards for Customer Service, Ontario Regulation*
5. *Recruitment, Hiring and Staffing (Administrative Policy HR-G-19)*

## **STANDARDS OF ACCESSIBILITY UNDER AODA**

Customer Service: Service delivery to the public; also includes business practices, employee training.

Transportation: This standard needs to reflect a variety of environments, financial capabilities of users/providers and the differing modes of travel including conventional and specialized modes, and on-demand taxi services.

Information and Communication: Information and communications provided to the consumer or end-user through print, telephone, electronic devices, and in person; also includes publications and software applications.

Design of Public Spaces: Access to, from and within buildings and outdoor spaces; also includes counter heights, aisle and door widths, parking, signage, pedestrian access routes and signal systems.

Employment: Hiring and retaining employees; also includes employment practices, policies and processes such as job advertisements and interviewing.

*Principles of Customer Service:*

Dignity: Refers to policies, procedures and practices that treat a person with a disability as a client who is as valued and deserving of effective and full service as any other client. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services and show respect for these methods.

Independence: In some instances, independence means freedom from control or influence of others' freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor.

Integration: Integrated services are those services that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other clients. Integration means that policies, practices and procedures are designed to be accessible to everyone including people with disabilities. Sometimes integration does not serve the needs of all people with disabilities. In these cases, it is necessary to use alternate measures to provide goods or services. Alternate measures are ways of serving people that are not completely integrated into the regular business activities of the organization, for example, email.

Equal Opportunity: Equal opportunity means having the same chances, options, benefits and results as others. In the case of services, it means that people with disabilities have the same opportunity to benefit from the way you provide services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or inconvenience.

## **REVIEW HISTORY**

Created: July 2009

Formerly: *Accessible Customer Service – Administrative Policy 1.1*

Revised: *Accessibility – Administrative Policy 1.2* (March 2018)

Revised: *Accessibility – Administrative Policy 1.3* (January 2021)