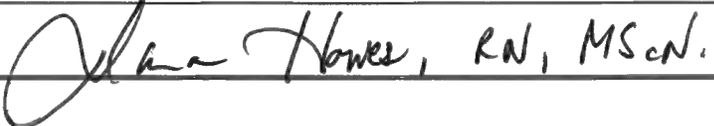


ADMINISTRATION POLICIES AND PROCEDURES MANUAL

Policy Covering: ACCESSIBILITY POLICY			
Effective Date: March 2023	Section: General Administration	Policy # ADM 1-15	
Reviewed Date: March 2023			
Prepared By: Manager of OHS & Risk, Manager of Human Resources	Supersedes Policy #/Dated: ADM 1-15/September 2021		Page 1 of 11
Cross Reference:		Related Forms:	
Reviewed by: Health Equity Committee			
Issued By: President & CEO 			

ORGANIZATIONAL COMMITMENT:

Hanover & District Hospital (HDH) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws.

HDH is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

HDH understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its 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.

HDH is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

DEFINITIONS:

Accessible: Customer service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached; or entered; obtainable.

Assistive Device: Used by people with disabilities to help with daily living. They include a broad range of products such as but not limited to walkers, canes, wheelchairs, oxygen tanks, portable chalk boards and electronic communication devices that people may bring with them to the hospital.

Disability:

- Any degree of physical infirmity, malformation or disfigurement that requires assistance (for additional information or clarification, see the AODA, 2005)
- A condition of mental impairment or a developmental disability
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- A mental disorder
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

Service Animals: Any guide dog, signal dog, or other animal individually trained to do work or perform tasks for the benefit of an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.

PROCEDURES:**SECTION ONE (1): Training**

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards;
- our policies related to the Customer Service Standards;
- 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;
- 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 i.e. wheelchairs, mechanical lift equipment, communication boards, pocket talker etc.; and
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We 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.

SECTION TWO (2): Assistive Devices

- The right of the individual to use a personal assistive device while accessing goods and services provided by Hanover and District Hospital is respected and accommodated;
- A patient's assistive device(s) will remain with the patient at all times except where there is a requirement for exclusion of said device:
 - Due to infection control risk
 - Risk of harm to the device and/or individuals
- Staff will develop a plan with the person with the assistive device to arrange for alternate support in the event that the assistive device is unable to stay with the patient;
- We 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 patients with disabilities while accessing our services or facility; and
- Training of assistive devices will take place in applicable department and tailored to the needs of the patient at the time.

SECTION THREE (3): Communication

- We communicate with people with disabilities in a way that take into account their disability. This may include the following; email, posters, verbal; and
- We will work with the person with disabilities to determine what method of communication works for them.

SECTION FOUR (4): Service Animals

- We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties;
- When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability; and
- 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, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded; and
- 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 including but not limited to the following areas:

- Operating Rooms

- Minor Procedure rooms or rooms where sterile interventional procedures are occurring
- In any room where radiation exposure occurs (x-ray, CT)
- Rooms in which transmission based precautions are in place (isolation rooms)

SECTION FIVE (5): Support Persons

- In certain cases, the Hanover & District Hospital might require a person with a disability to be accompanied by a support person for health or safety reasons. Before making a decision, the Hanover & District Hospital will:
 - Consult with the person with the disability to understand their needs
 - Consider health or safety reasons based on available evidence
 - Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.
- In such a situation, the Hanover & District Hospital will waive the admission fee or fare for the support person, if one exists;
- Support persons may accompany people with disabilities in all areas of the hospital except where excluded by law;
- Where a support person is excluded by law, Hanover and District Hospital will accommodate an alternative for the person with disabilities to access our goods and services;
- Support persons may not be permitted in areas where some sterile procedures occur in accordance with the Health Promotion and Protection Act including but not limited to:
 - Operating Rooms,
 - Minor Procedure Rooms (case specific)
 - In any room where radiation exposure occurs (X-ray, CT)
- Staff will inform the person with a disability of areas where the presence of a support person is not allowed prior to their arrival (when possible) and will develop an accessibility plan with the individual identifying alternate support arrangements;
- Confidentiality and privacy of the person with a disability and other clients will be respected at all times by staff and may be requested of the support person where applicable (i.e. group counseling sessions);
- Staff may request a support person be provided by the patient in order to protect the health and welfare of a person with disability; and
- Patients with disabilities must be allowed to use their support persons while accessing the organization's goods or services on the parts of the premises open to the public or third parties.

SECTION SIX (6): Notice of Temporary Disruption

- In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, HDH will notify customers promptly;
- This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available;
- The notice will be made publicly available by posting the information at a conspicuous place on Hospital premises, by posting it on the hospitals website, or by such other method as is reasonable in the circumstances.

SECTION SEVEN (7): Feedback Process

- HDH welcomes feedback on how we provide accessible customer service;
- Customer feedback will help us identify barriers and respond to concerns;

- Feedback may be in person, in writing, by e-mail, telephone, electronic text or other methods as agreed upon between the individual and the hospital;
- Feedback will be directed to the Manager and/or designate who will coordinate with necessary resources as required, addressing the concerns of the person providing the feedback;
- We will ensure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request; and
- Customers can expect to receive follow up within 30 days.

SECTION EIGHT (8): Notice of Availability of Documents

- HDH notifies the public that documents related to accessible customer service, are available upon request by posting a notice in the following location(s)/way(s): website, patient feedback survey is available outside of the department; hard copies, digital access and on website;
- We will provide these documents in an accessible format or with communication support, on request;
- We will consult with the person making the request to determine the suitability of the format or communication support; and
- We will provide the accessible format in a timely manner and, at no additional cost.

SECTION NINE (9): Self-service Kiosks

- We will incorporate accessibility features/consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

SECTION TEN (10): Procurement

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

SECTION ELEVEN (11) – Information and Communications

- We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request;
- We communicate with people with disabilities in ways that take into account their disability;
- When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:
 - a) in a timely manner, taking into account the person’s accessibility needs due to disability;
 - b) at a cost that is no more than the regular cost charged to other persons.
- We will consult with the person making the request in determining the suitability of an accessible format or communication support;
- If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:
 - a) an explanation as to why the information or communications are unconvertible;
 - b) a summary of the unconvertible information or communications.
- We notify the public about the availability of accessible formats and communication supports by website; and

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

SECTION TWELVE (12) – Employment

- We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring;
- We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request;
- We consult with the applicants and provide or arrange for suitable accommodation;
- We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment;
- We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment;
- We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability;
- We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability;
- We 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, we will also provide customized emergency information to help an employee with a disability during an emergency;
- With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency;
- We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability;
- We will review the individualized workplace emergency response information when:
 - a) employee moves to a different location in the organization
 - b) employee's overall accommodations needs or plans are reviewed
 - c) employer reviews its general emergency response policies
- We have 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; and
- Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

SECTION THIRTEEN (13) – 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; and
- Accessible formats are available upon request.

REFERENCES:

1. Accessibility for Ontarians with Disabilities Act, 2005
2. Ontario Regulation 191/11 Integrated Accessibility Standards

APPENDIX:

Appendix A – Guidebook for Accessibility Standards for Customer Service



GUIDEBOOK FOR ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

*Cross Reference: Accessibility Standards for Customer
Service Policy (ADM 1-15)*

ACCESSIBILITY - GUIDE DOGS AND OTHER SERVICE ANIMALS

Clinical Note: Guide dogs and other service animals are not pets but working animals. Hanover and District Hospital (HDH) staff, physicians, volunteers, and students providing goods and services to persons with disabilities will refrain from touching or petting guide dogs and other service animals.

GUIDELINES

1. Tips on interacting with a patient who uses a service animal:
 - a. A service animal is a working animal, not a pet.
 - b. Avoid touching or addressing Service animals: they are working and are required to pay attention at all times.
 - c. Avoid making assumptions about the animal. Not all Service animals wear special collars or harnesses. If you are not sure if the animal is a pet or Service animal, ask the person with a disability.
 - d. Patient is responsible for the care and supervision of their Service animal. Staff is not expected to provide care or food for the animal. However, staff can provide water for the Service animal if the patient requests this.

2. Service animals and their roles:

Service Animal	Key Tasks	Users
Autism assistance or service dog.	<ul style="list-style-type: none">• Keeps a child from running into danger and provides assistance when sensory stimulus is heightened. Dog is attached to the child's waist by a belt and a leash held by an adult.	People with autism or other developmental/intellectual disabilities.
Guide dog, dog guide or seeing eye dog	<ul style="list-style-type: none">• Follows directions of owner, alerts owner to changes in elevation (e.g., curbs, stairs) and obstacles.	People with vision loss.
Hearing ear, hearing, sound alert or hearing alert dog, cat or animal	<ul style="list-style-type: none">• Alerts owner to sounds often by a nudge or pawing and leads him/her to the source of the sound.• May use a special signal to alert owner to fire alarm.	People who are Deaf, oral deaf, deafened or hard of hearing.
Psychiatric service dog	<ul style="list-style-type: none">• Retrieves and prompts the person to take medicine, retrieves or activates medical alert, leads person out of crowds, etc.	People with mental health disabilities.
Service or mobility dog or animal, special skills dog or animal (Small ponies or miniature horses are used but are not as common).	<ul style="list-style-type: none">• May pull wheelchairs, carry objects, pull items, turn handles or push buttons such as door openers. Larger dogs may provide balance support.	People with physical disabilities.

Seizure, seizure alert, seizure assist or seizure response dog or animal

- Steers owner from danger during a seizure, activates medical alert
- Can alert owner to an oncoming seizure

People who have epilepsy or other seizure disorders.

ACCESSIBILITY - PERSONAL ASSISTIVE DEVICES

GUIDELINES

1. When communicating with a person with a disability, do so in a manner that takes into account the person's disability.
2. Think about and/or learn how people with disabilities communicate. Be flexible in planning your approach, use of written, spoken, or picture form or other assistive device may be useful.
3. Ask the patient directly about their preferred method of communication
4. Plan ahead where possible to ensure the appropriate assistive device is available.
5. A variety of assistive measures are available for patients such as: lifts, staff resources, physiotherapy, wheelchair, etc.

ACCESSIBILITY - SUPPORT PERSON

GUIDELINES

1. Support person role:
 - a. Individual hired or chosen to accompany a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or access to goods or services.
 - b. Provides care needs:
 - i. Personal care needs including but not limited to assistance with eating or using the washroom.
 - ii. Medical needs may including but not limited to, monitoring the person with a disability's health conditions, providing injections and providing support when someone has moderate to severe seizures.
 - c. Support person can be a paid personal support worker, volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.
2. Interacting with a patient who has a support person:
 - a. The person with a disability may not introduce their support person. If you are not sure which person is the patient, take your lead from the person using or requesting your service and/or simply ask.
 - b. Once you have determined who the patient is, speak directly to them, not to their support person.
 - c. Staff should be familiar with Hanover and District Hospital policies, practices and procedures about providing accessible customer service.
3. Person with disability and support person role:

Person with a Disability	Support Person's Functions
Person who is deaf/blind	To guide, to provide transportation and adaptive communication such as tactile or adapted American Sign language, large print notes, print on palm or two-handed manual signing.
Person who is deaf, deafened, oral deaf	To provide sign language or oral interpretation services - to translate conversation, not to participate in it.
Person with a learning disability	To help with complex communication or note-taking.
Person with an intellectual/ developmental disability	To help with travel, daily activities, prompting medication, complex tasks, or to keep them from dangerous situations.
Person with a mental health disability	To help with communication tasks such as completing complex forms. To help in environments such as crowded, noisy settings or high-stress situations such as interviews.
Person with a physical disability	To provide services related to traveling, personal care such as toileting or eating, monitoring medical conditions.
Person with a seizure disorder	To assist in the event of a seizure, e.g. to protect the individual from falls or biting their tongue.
Person with a speech impairment who uses an augmentative or alternative communication system (symbol board, electronic communication system)	To relay or interpret a person's communications.
Person with vision loss	To read or to guide.

Ministry of Community and Social Services. Training Resource - Customer Service Standard 429/07 Pg. 31

REFERENCES

Accessibility for Ontarians with Disabilities Act, 2005

Accessibility for Ontarians with Disabilities Act, 2005 Customer Service Standard 429/07

Americans with disabilities Act, 1990

Blind Persons' Rights Act. R.S., c. 40, s. 1, s. 2

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