

Section: Management System\HHHS\Corporate - Accessibility\

Approved By: Board of Directors

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Purpose

This policy is drafted in accordance with the Integrated Accessibility Standards (Ontario Regulation 191/11) and addresses how the Haliburton Highlands Health Services (HHHS) achieves or will achieve accessibility by meeting the requirements of the regulation. The requirements will be met within the timeframes set in the Regulation.

The requirements of the regulation include:

- The establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines HHHS' strategy to prevent and remove barriers and meet its requirements under this Regulation;
- Since HHHS does not currently have any self-service kiosks, nor any plans to purchase kiosks, this requirement does not apply to HHHS;
- Training; and
- The specific requirements under the Information and Communication Standards, Employment Standards, Transportation Standards, the Design of Public Spaces Standards, and Customer Service Standards.

Scope and Responsibilities

This policy shall apply to every person who deals with a member of the public or their agents on behalf of HHHS, whether the person is an employee, agent, volunteer or otherwise.

Responsibilities of Employees

- Act in accordance with this policy and related legislation as amended from time to time and be aware of consequences on non-compliance; and
- Participate fully in training as it relates to this policy.

Responsibilities of Employer

- Ensure all requirements of the IASR, O. Reg. 191/11 under the AODA are met on an ongoing basis within the timelines set out in the regulation.

Policy Statement and Organizational Accessibility Commitment

HHHS is committed to treating all people in a way that allows the individual to maintain dignity and independence to the greatest extent possible across all of its services and sites. This

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commitment is founded in the HHHS core value of respect. HHHS also supports integration and equal opportunity. HHHS is committed to a continuous quality improvement effort aimed at increasing the accessibility of communications, services and facilities for patients, visitors/public, staff and volunteers. The HHHS goal is that patients, clients and residents with disabilities can participate fully in their healthcare and that appropriate supports to do so are available and timely.

Definitions

- a) **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.
- b) **Accommodation** means the special arrangements made or assistance provided so that customers with disabilities can participate in the experiences available to customers without disabilities. Accommodation will vary depending on the customer's unique needs.
- c) **Assistive devices** are 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 organization.
- d) **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.
- e) **Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received;
- f) **Conversion ready** means an electronic or digital format that facilitates conversion into an accessible format;
- g) **'Disability'** is:
 - 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

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- 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.
- h) **Information** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- i) **Maintenance** means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, example of which include painting and minor repairs.
- j) **Off-street parking facilities** includes open area parking lots and structures intended for the temporary parking of vehicles by the public, whether or not the payment of a fee is charged and includes visitor parking spaces in parking facilities.
- k) **Redeveloped** means planned significant alterations to the public spaces, but does not include maintenance activities, environment mitigation or environmental restoration.
- l) **Service animals** are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks.
- m) **Volunteer** may include a person who voluntarily undertakes a task on behalf of HHHS

General Provisions

The Multi-Year Plan:

1. Describes the process by which Haliburton Highlands Health Services will identify barriers, remove and prevent barriers for people with disabilities
2. Articulates the current state of compliance with accessibility standards in the following categories:
 - a. General
 - b. Customer Service
 - c. Information and Communications
 - d. Employment
 - e. Transportation
 - f. Built Environment
3. Articulates the opportunities for improvement based on the current state.

Procurement or Acquiring Goods, Services and Facilities

HHHS shall use accessibility criteria and features when procuring or acquiring goods, services, and facilities. If it is not practicable to do so, staff will provide an explanation, upon request.

Self-Service Kiosks

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Should HHHS institute self-service kiosks at its facilities, the design, procurement or acquisition of self-service kiosks shall have regard to this policy and Ontario regulations, as amended.

Training

HHHS will ensure that training is provided, as soon as practicable, on the requirements of the accessibility standards referred to in the regulation and on the Human Rights Code as it pertains to persons with disabilities to: all employees, volunteers and others who deal with the public or other third parties on our behalf, and those who are involved in the development and approval of policies, practices and procedures.

HHHS will retain and maintain a record of the training provided, including the dates on which the training took place and the number of individuals trained. If any changes are made to this policy or the AODA regulations, training will be provided. Agents or third parties hired by HHHS who deal with the public during their work will provide proof of Accessibility Awareness training prior to their work for the agency.

Information and Communication Standards

Feedback

HHHS ensures that the processes for receiving and responding to feedback are accessible to individuals with disabilities, and will provide or arrange for the provision of accessible formats and communications supports, upon request.

HHHS' CEO focuses on improving communication, accessing information or resources, and addressing and resolving difficulties. Feedback is welcome through the Administration Office:

- by telephoning the CEO & President, Monday to Friday 9:00 a.m. to 5:00 p.m. at (705) 457-1392 ext. 2242;
- in person by 7199 Gelert Road, Haliburton, ON K0M 1S0 (during regular business hours);
- by regular mail to the Attention of CEO & President, Box 115, Haliburton, ON K0M 1S0; and
- by email to mvieira @ hhhs.ca.

Accessible Formats and Communication Supports

- a. HHHS will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,
 - i. In a timely manner that takes into account the person's accessibility needs due to disability; and
 - ii. At a cost that is no more than the regular cost charged to other persons.
- b. HHHS will consult with the person making the request in determining the suitability of an alternative format or communication support.

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Website Accessibility

- a. Beginning January 1, 2014 all new HHHS internet websites and web content on those sites will comply to the WCAG 2.0 Level A;
- b. As of January 1, 2021 all HHHS internet and web content will conform with the WCAG 2.0 Level AA, other than: success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded); and
- c. Websites and web content, including web-based applications, that HHHS controls directly or through a contractual relationship that allows for modification of the product, are included in this timeline, where practicable.

Employment Standards

Recruitment

HHHS will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and other candidate selection methods. If a selected applicant requests accommodation, HHHS shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability. HHHS will notify the successful applicant of their policies and supports for accommodating people with disabilities.

Informing Employees of Supports

HHHS informs its employees of its policies used to support individuals with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account personnel accessibility needs due to disability. HHHS shall provide support information to new personnel as soon as practicable after they begin their employment. HHHS provides updated information to personnel whenever there is a change to existing policies on the provision of job accommodations that take into account individuals accessibility needs due to disability.

Accessible Formats and Communication Supports for Personnel

At the request of personnel with a disability, HHHS consults with the individual to provide or arrange for the provision of accessible formats and communication supports with respect to any:

- Information that is needed in order to perform the individual's job;
- Information that is generally available to personnel in the workplace; and
- The suitability of an accessible format or communication support.

Documented Individual Accommodation Plans

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HHHS has a written process for the development of documented individual accommodation plans for its employees with disabilities.

Individual accommodation plans include:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- The ways an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- Employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace if not from a bargaining agent;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- If denied, the reasons for denial are to be provided by the employee;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.
- If requested, any information regarding accessible formats and communication supports provided; and
- Identification of any other accommodation that is to be provided.

Return to Work

HHHS has a documented return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The return to work process outlines the steps HHHS takes to facilitate the return to work of employees who were absent because their disability required them to be away from work. The process also uses documented individual accommodation plans as part of the process. (see *Ability Management Program* POL.ADM.xxx outlining the comprehensive return to work process.)

The foregoing process, however, does not replace or override any other return to work process created by or under any other applicable law or regulation.

Performance Management

Any performance management HHHS uses in respect of its employees takes into account the accessibility needs of individuals with disabilities, as well as individual accommodation plans.

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Career Development and Advancement

HHHS takes into account the accessibility needs of its employees with disabilities, as well as any individual accommodation plans, when providing career development and advancement opportunities to individuals with disabilities.

Redeployment

HHHS takes into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying individuals with disabilities.

Workplace Emergency Response Information

HHHS provides individualized workplace emergency response information to personnel who have a disability, if the disability is such that the individualized information is necessary and HHHS is aware of the need for accommodation due to the individual's disability. If staff who receive individualized workplace emergency response information requires assistance and with that persons consent, HHHS shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. HHHS shall provide the information as soon as practicable after the employer becomes aware of the need for accommodation due to the individual's disability.

HHHS reviews individualized workplace emergency response information:

- When the individual moves to a different location in the organization;
- When the employee's overall accommodations needs or plans are reviewed; and
- When HHHS reviews its general emergency response policies.

Transportation Standard

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers. HHHS will commit to excellence in serving all clients/patients/residents, including those with disabilities, by creating policies, practices and procedures that allow staff to effectively carry out the functions and responsibilities for transportation service, including but not limited to:

- Ensuring staff and volunteers know how to interact and communicate with people with various types of disabilities.
- Ensuring staff and volunteers are trained and familiar with various assistive devices.
- Ensuring staff and volunteers are trained to communicate with clients over the telephone in clear and plain language, speaking clearly and slowly; and in the use of other communication services.
- Ensuring that a support person accompanying a person with a disability is not charged a fare when there is a demonstrated need for the support person.

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- Providing a mechanism for clients to recommend service improvements and/or complaints.
- Providing notice if the service is temporarily unavailable due to mechanical/maintenance issues with the vehicles.
- Providing invoices in various formats upon request: large print and email, and that staff can answer questions about the content of the invoice in person, by telephone or email.

Design of Public Spaces Standards

Exterior Paths of Travel

- (1) When HHHS builds new or makes major changes to existing paths of travel the minimum height requirements for outdoor sidewalks and walkways, ramps, stairs, and curb ramps are taken into consideration.
- (2) Maximum ratio requirements for slopes and sidewalks are also considered along with the firmness, stability and slip resistance of ramps and stairs surfaces.

Accessible Parking

- (1) When HHHS constructs any new or makes major changes to existing off-street parking wider parking spaces for people who use mobility aids such as wheelchairs and standard-width spaces for people who use mobility assistive devices such as canes, crutches and walkers are included in the construction.
- (2) The number of available accessible parking spaces is in compliance with the total number of existing parking spaces.
- (3) Access aisles to allow persons with disabilities to get in and out of their vehicles are also provided.

Obtaining Services

Service Counters

When constructing new service counters, which includes replacing existing service counters HHHS shall ensure:

- i. that at least one service counter that is accessible to people who use mobility aids such as wheelchairs;
- ii. The counter is low enough for someone sitting in a mobility aid;
- iii. The counter has sufficient clear space for the person's knees; and
- iv. The service counter is clearly identified with sufficient signage.

Waiting Areas

When constructing new waiting areas or redeveloping an existing waiting area HHHS shall ensure:

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- i. At least three percent of seating in HHHS waiting areas that have seating fixed to the floor is accessible for someone using a mobility aid; and
- ii. No fewer than one seating space is accessible.

Maintenance

- i. HHHS' accessibility plan includes its preventative and emergency maintenance procedures for the accessible parts of its public spaces, including posting of regular maintenance schedules and letting people know about alternatives.
- ii. Procedures for handling temporary disruptions in service when an accessible part of HHHS' public spaces stops working is also part of the plan.

Customer Service

Policies, Practices and Procedures

- (1) Goods or services will be provided in a manner which respects the dignity and independence of the individual and in a manner that takes into account the person's disability.
- (2) Provision of goods and service will be integrated unless an alternate measure is necessary to enable the person with a disability to obtain, use or benefit from any goods or services.
- (3) Persons with disabilities will be given equal opportunity to obtain, use or benefit from goods or services.
- (4) When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.

Assistive Devices

- (1) The right of the individual to use an assistive device while accessing goods and services provided by HHHS is respected and accommodated.
- (2) A customer's assistive device(s) will remain with the customer at ALL times except where there is a requirement for exclusion of said device:
 - a. Due to infection control risk
 - b. Risk of harm to the device and/or individuals
 - c. Interference with other equipment
- (3) Manager and 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 customer.
- (4) If HHHS provides any assistive devices, a staff person will ensure the customer knows how to operate that assistive device.

Use of Service Animals and Support Persons

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- (1) Guide dogs, service animals and support persons may accompany people with disabilities in all areas of the organization except where excluded by law.
- (2) Guide dogs and service animals may also not be permitted where there is a significant risk to a staff person or member of the public (identified risk of severe allergic reaction).
- (3) Guide dogs, service animals and support persons may not be permitted where sterile procedures occur in accordance with the Health Promotion and Protection Act including but not limited to:
 - a. Minor Procedure Rooms or Rooms where sterile interventional procedures are occurring
 - b. In any room where radiation exposure occurs (X-ray)
 - c. Rooms in which transmission based precautions are in place (Isolated rooms)
- (4) Where a guide dog, service animal or support person is excluded by law, HHHS will accommodate alternate ways for the person with disabilities to access the organization's goods and services.
- (5) HHHS may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, HHHS determines that,
 - a. a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
 - b. there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.
- (6) If an amount is payable by a support person for admission or otherwise to a premise, HHHS will ensure notice is given in advance about the amount.
- (7) Infection Prevention and Control and/or the Manager on Call must be contacted whenever a patient with a guide dog or service animal is admitted to the hospital or a service, or, whenever there is a concern regarding the safety and/or security of persons in the area. A patient admitted with a guide dog or service animal will be accommodated in a private room.
- (8) The care and control of the guide dog or service animal is the responsibility of the owner.
- (9) The person who requires the guide dog or service animal may be asked to provide a letter from a physician or nurse, or documentation from the Ministry confirming the person requires a guide dog or service animal, if it is not readily identifiable (i.e. collar, harness or cape).

Notice of Temporary Disruptions

If there is a temporary disruption in the facilities or services of HHHS which persons with disabilities usually use in order to access goods and services, HHHS shall give notice of the disruption to the public. The notice of disruption shall include the reason for the disruption, its

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anticipated duration and a description of alternative facilities or services, if any, that are available. The notice will be posted at a conspicuous place onsite at HHHS and on the website.

Customer Service Training for Staff

Training will include a review of the purposes of the Act, the requirements of the Regulation(s) and instruction about:

- i. How to interact with persons with various types of disabilities.
- ii. How to interact with persons with disabilities who use an assistive device, require assistance of a Service animal or the assistance of a support person.
- iii. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
- iv. What to do if a person with a particular type of disability is having difficulty accessing the provider's good or services.

Referenced Documents

- Accessibility for Ontarians with Disabilities Act, 2005
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm#BK19
- Integrated Accessibility Standards, Ontario Regulation 191/11
http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm#BK0
- Ministry of Community and Social Services, Making Ontario Accessible (Access ON)
<http://www.mcscs.gov.on.ca/en/mcscs/programs/accessibility/index.aspx>
- Ontario Human Rights Code, 1990
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm