

Policy:	Accessibility for Persons with Disabilities		
Owner:	VP People & Employee Experience (CHRE)		
Endorsed By:	VP People & Employee Experience (CHRE) Executive Leadership Collaborative	Endorsement Date:	2025-03-31 2025-04-22
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PURPOSE

The purpose of this policy is to establish London Health Sciences Centres (LHSC) commitment to accessibility in accordance with the [Ontario Human Rights Code](#) and the [Integrated Accessibility Standards Regulation \(IASR\)](#) under the [Accessibility for Ontarians with Disabilities Act \(AODA\)](#).

Refer to the [LHSC's Multi-Year Accessibility Plan](#) for additional requirements.

AUDIENCE

This policy applies to all LHSC staff, including individuals working at LHSC funded through an external source, Credentialed Professional Staff, clinical fellows, residents, student, volunteers, and contract workers. It applies to work conducted both onsite on LHSC owned and rented properties, as well as remote work.

POLICY

LHSC is committed to ensuring equal access and participation for people with disabilities and treating people with disabilities in a way that promotes [dignity](#), self-determination, and [individualization](#).

LHSC believes in [integration](#) and is committed to meeting the needs of people with disabilities in a timely manner. LHSC will remove and prevent [barriers](#) to accessibility and meet the accessibility requirements under Ontario's accessibility laws.

Refer to [Workplace Accommodation](#) for more information for procedures related to supporting LHSC staff members with a [disability](#).

Refer to [Safekeeping of Patient Belongings and Personal Property](#) for safekeeping and documentation requirements for [assistive devices](#).

ROLES AND RESPONSIBILITIES

1. **Staff and [Affiliates](#) will:**

- 1.1. Ensure they understand the intent of this policy.
- 1.2. Participate in identifying accessibility barriers and planning for barrier removal.

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- 1.3. Provide a welcoming, inclusive environment for people with disabilities, including any person with a disability using assistive devices or accompanied by a [support person](#) or service animal.
- 1.4. Request support from their leader when accommodation requests are outside their area of responsibility, or beyond their capacity.
- 1.5. Complete mandatory training related to AODA and the Ontario Human Rights Code.
- 1.6. Welcome persons with disabilities to use their own assistive devices to obtain, use or benefit from the goods, services, and facilities offered by LHSC (refer to [Safekeeping of Patient Valuables and Personal Property](#)).
- 1.7. Welcome persons with disabilities to bring their support person on site as needed.
- 1.8. If a support person cannot attend for any reason, a conversation with the individual living with the disability will take place to ensure their needs are met and identified risks have been mitigated.
- 1.9. Welcome persons with disabilities accompanied by their [service animal](#) to keep that animal with them where members of the public are permitted to enter. In the event the animal is excluded by law, LHSC must ensure other measures are available to enable the person with a disability to obtain, use or benefit from LHSC services and facilities refer to [Appendix A - Use of Service Animal](#)).
2. **LHSC and Medical Leaders will:**
 - 2.1. Provide leadership in establishing an inclusive and [accessible](#) environment for the public and all staff.
 - 2.2. Facilitate requests for accommodation by patients, care partners, and staff with disabilities in a timely manner, to the point of [undue hardship](#), in accordance with the Ontario Human Rights Code, this policy and the [Workplace Accommodation](#) procedure.
 - 2.3. Prevent barriers by including accessibility considerations in the development of new policies, practices, procedures or bylaws.
 - 2.4. Ensure that the policy is communicated to all staff within their scope of responsibility.
 - 2.5. Act on issues of non-compliance within their area of responsibility.
 - 2.6. Consult with Occupational Health & Safety (OHS), Human Resources, Facilities Management and/or Health Equity for assistance with accessibility issues.
 - 2.7. Support the implementation of the [Multi-Year Accessibility Plan](#) outlining the corporate strategy to identify, remove and prevent barriers and to meet AODA legislated requirements.
 - 2.8. Provide information and communications in [alternate formats](#) upon request, or with communication support, consulting with the requestor about their preferred format.
 - 2.8.1. Only information necessary to provide the accessibility-related support should be collected. Ensure individuals are aware of why their information is being collected, used, disclosed.
 - 2.9. Ensure all feedback processes are accessible to persons with disabilities by providing or arranging for alternate formats and communication supports upon request.

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- 2.10. Complete required training for Leaders/Supervisors.
- 2.11. When acquiring or procuring goods, services, and facilities incorporate accessibility criteria and features as early as possible in the procurement process. Where it is not practicable to do so, an explanation will be provided upon request.
3. **Executive Leadership will:**
 - 3.1. Ensure resources are budgeted for identifying and preventing accessibility barriers and for planning for barrier removal to remain compliant to accessibility standards.
 - 3.2. Implement this policy and develop or amend applicable departmental or corporate procedures or documents to adhere to this policy.
 - 3.3. Work with their leadership team to address any issues of non-compliance under the Policy or [Multi-year Accessibility Plan](#).
 - 3.4. Provide AODA compliance assurance when required.
 - 3.5. Approve accessibility reports as required.
4. **Individuals Living with Disabilities will:**
 - 4.1. Make accommodation needs known to the area leader to the best of their ability and as soon as possible.
 - 4.2. Communicate any changes to accessibility needs as soon as possible to the area leader.
 - 4.3. Answer questions or provide information about relevant restrictions or limitations, including information from health care professionals, where appropriate and as needed.
 - 4.4. Take part in discussions about possible accommodation solutions.
 - 4.5. Collaborate with any experts whose assistance is required to manage the accommodation process or when additional information is needed.
5. **Patient Relations will:**
 - 5.1. Ensure a process is in place for receiving and responding to feedback, including feedback on how services are delivered to people with disabilities. This process must be accessible to persons with disabilities by providing or arranging for the provision of alternate formats and communication supports upon request.
 - 5.2. Accessibility-related feedback is collected by email at Accessibility@lhsc.on.ca or via the Patient Experience Office by phone at 519-685-8500 extension 58230, by email at patientrelations@lhsc.on.ca or through the [Patient Relations Contact Form](#). A response can be expected within a maximum number of three business days.
6. **Health Equity will:**
 - 6.1. Provide oversight to the LHSC Accessibility Policy governing how the organization will achieve the requirements established under AODA.
 - 6.2. Maintain this policy and ensure the policy is available on the [LHSC Accessibility internet/intranet websites](#).

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- 6.3. Establish, maintain, and make public a [Multi-Year Accessibility Plan](#) outlining the corporate strategy to identify, remove and prevent barriers and to meet AODA legislated requirements.
- 6.4. Submit a complete compliance report to the Ministry of Health every two (2) years, in accordance with the schedule set out in the AODA.
- 6.5. Communicate any required changes regarding AODA mandated training on an ongoing basis in respect to this policy.
- 6.6. Support the engagement of community and internal stakeholders, including those living with disabilities, to ensure new projects and builds are inclusive and accessible.
- 6.7. Work with leaders to address any issues of non-compliance under the Policy or [Multi-year Accessibility Plan](#).
- 6.8. Provide an annual update on the progress made under the [Multi-year Accessibility Plan](#).
7. **Information Technology Solutions (ITS) will:**
 - 7.1. In consultation with LHSC's procurement vendor, ensure accessibility features are incorporated when designing, procuring or acquiring self-serve electronic kiosks (interactive electronic terminals).
 - 7.2. Collaborate with Corporate Communications & Public Engagement to ensure all websites and web content is AODA compliant.
8. **Communications & Public Engagement will:**
 - 8.1. Ensure all information intended for the public is made available in alternate formats or with communication supports upon request. If the information cannot be made available in an alternate format for reasons identified under the IASR and AODA Communication Standards, this will be communicated to the person making the request.
 - 8.2. Ensure the LHSC internet website and web content, controlled directly by LHSC or through a contractual relationship allows for modification of the product, and conforms to World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, as per the IASR and in the Accessible Information, Communications, and Technology Guidelines.
 - 8.3. In consultation with ITS, establish and maintain procedures, standards and guidelines to ensure all internet websites and web content is accessible.
 - 8.4. Support all departments and individuals who manage content on the LHSC website to ensure accessibility based on approved procedures, standards and guidelines.
9. **Facilities Management will:**
 - 9.1. Ensure all property owned by LHSC is compliant with AODA Standards for new construction, repairs or improvements. Safety issues affecting accessibility will be addressed to meet current AODA standards.
 - 9.2. Give notice of any temporary planned or unplanned service disruption of facilities, services or systems that are relied upon by people with disabilities to access LHSC services or facilities, such as elevators, lifts, or accessible washrooms. In the event of an unexpected disruption, notice must be provided as soon as possible. Notices are provided on the LHSC Intranet and external public facing LHSC website.

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- 9.3. Ensure procedures are up to date for preventative and emergency maintenance and temporary disruptions of accessible elements in public spaces. Review related standard operating procedures on an annual basis to ensure they remain updated.

10. Third Party Contract Vendors will:

- 10.1. Ensure their staff have received AODA and Ontario Human Rights training as required by the IASR.
- 10.2. Complete an annual 'Declaration of Compliance with Anti-Harassment/Discrimination Legislation and LHSC Policy' form confirming that they will uphold LHSC policies and procedures and their obligations under provincial legislation, including the provision of accessibility training. Third parties may be required to provide records to show training has been done.

11. Human Resources will:

- 11.1. Keep a record of AODA mandated training, including the dates on which accessibility training took place, and the names of individuals trained. Training on specific accessibility standards according to the person's duties include:
- 11.1.1. Information and Communications Standards – for individuals whose duties and responsibilities involve communicating with, giving information to or receiving information from others.
 - 11.1.2. Employment Standards – for individuals involved in any aspect of the employment cycle, including recruiting, hiring, retaining, and exiting.
 - 11.1.3. Design of Public Spaces Standards- for individuals who are involved in building on or making planned alterations to the public space.
 - 11.1.4. Training may also include how to use and maintain assistive devices at a specific location (e.g., mechanical lifts, TTY, assistive listening devices).
- 11.2. Post information about the availability of accommodation for internal and external job applicants with disabilities in its recruitment process.
- 11.3. Notify job applicants who are selected for an interview and/or testing that accommodations are available on request.
- 11.4. Consult with an applicant who requests accommodation, and arrange for the provision of a suitable accommodation in a timely manner (refer to [Recruitment \(Non-Union and Leadership\)](#)).
- 11.5. Notify successful applicants about LHSC policies and procedures for accommodating individuals with disabilities as part of their offer of employment.
- 11.6. Provide updated information and education to all employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to disability.
- 11.7. Maintain a return to work process for individuals returning to work following an illness or injury where disability-related accommodations are required (refer to [Workplace Accommodation](#)).

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DEFINITIONS

Accessible – Service or care provided in a manner that is capable of being easily understood and accessed.

Alternative Formats – Any means of conveying information and/or communicating that is usable by persons with disabilities, including - but not limited to-large print, recorded audio and electronic format, and braille.

Affiliates – Individuals who are not employed by the organization but perform specific tasks at or for the organization, including:

- Credentialed Professional Staff means those Physicians, Dentists, Midwives and Registered Nurses in the Extended Class who are appointed by the Board and who are granted specific privileges to practice medicine, dentistry, midwifery or nursing, respectively,
- Students,
- Volunteers,
- Contractors or contracted workers who may be members of a third-party contract or under direct contract with the organization, and
- Individuals working at the organization but funded through an external source.

Assistive Devices – Items needed for activities of daily living (ADL), such as eyeglasses, dentures, hearing aids, limb prostheses, mobility devices such as canes, crutches, wheelchairs.

Barrier – A barrier is 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, architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, a policy or a practice.

Dignity – Encompasses individual self-respect, self-worth and inherent worth as a human being. It is concerned with physical and psychological integrity and empowerment.

Disability – A disability is:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, 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,
- A condition of mental impairment or a developmental disability,
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- A mental disorder, or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the [Workplace Safety and Insurance Act](#).

Emotional Support Animal – An animal that provides companionship, comfort, support, and security to individuals who often live with mental health conditions. They are not trained as service animals and do not have the same protection under legislative requirements.

Individualization – Each person's needs are unique and must be considered afresh when an accommodation request is made.

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Integration – Requires barrier-free and inclusive design and removing existing barriers. Where barriers continue to exist because it's impossible to remove them at a given point in time, then accommodation should be provided.

Performance Management – Activities related to assessing and improving staff/affiliate performance, productivity and effectiveness, with the goal of facilitating staff/affiliate success.

Service Animal – An animal specially trained to assist an individual with disabilities. Examples of service animals include dogs used by people who are blind, hearing alert animals for people who are deaf, deafened or hard of hearing, and animals trained to alert an individual to an oncoming seizure and lead them to safety. Ferrets, miniature donkeys, cats and parrots are other examples of service animals.

Support Person – Support persons are used by people with many kinds of disabilities. Some people with disabilities rely on support persons for certain services or assistance, such as using the washroom or facilitating communication. A support person may be a paid professional, a volunteer, a family member or friend of the person with a disability.

Undue Hardship – Refers to the point at which accommodating a person with a disability becomes excessively difficult or burdensome for the organization. If an accommodation is likely to cause significant health and safety risks, this could be considered “undue hardship.” Employers, housing providers and service organizations have an obligation to protect the health and safety of all their employees, clients and tenants, including people with mental health issues or addictions, as part of doing business safely, and as part of fulfilling their legal requirements of the *Occupational Health and Safety Act*. The [Code](#) recognizes that the right to be free from discrimination must be balanced with health and safety considerations.

REFERENCES

Legislation

[Accessibility for Ontarians with Disabilities Act](#)
[Accessibility Standards for Customer Service Ontario Regulation 429/07](#)
[Integrated Accessibility Standards, Ontario Regulation 191/11](#)
[Ontarians with Disabilities Act](#)
[Ontario Building Code, Ontario Regulation 332/12](#)
[Ontario Building Code Amendment, Ontario Regulation 368/13](#)

Corporate

[LHSC Multi-Year Accessibility Plan](#)
[Managing Patient and Care Partner Feedback](#)
[Recruitment \(Non-Union and Leadership\)](#)
[Workplace Accommodation](#)
[Interpretation and Translation Services](#)
[Safekeeping of Patient Valuables and Personal Property](#)
[Privacy](#)

Resources

[Ministry of Health and Long-Term Care - Assistive Devices Program](#)
[Web Content Accessibility Guideline Overview \(WCAG\)](#)

APPENDIX

Appendix A - [Use of Service Animals](#)

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