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| Policy: | Accessibility for Persons with Disabilities | | | | |
| Policy Owner: | Chair, Accessibility Committee | | | | |
| SLT Sponsor: | EVP, General Counsel & Chief People Officer | | | | |
| Approval By: | Director's Council | | | Approval Date: | 2009-12-08 |
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POLICY

Under the [Accessibility for Ontarians with Disabilities Act](#), London Health Sciences Centre (LHSC) is committed to providing accessible care, services and facilities to patients, visitors, staff and affiliates. Aligned with LHSC's core values of respect trust and collaboration, care, services and facilities are provided in a manner that respects the dignity and independence of all.

This policy sets out compliance with the [Customer Service Regulation](#) and the [Integrated Accessibility Standards](#), in accordance with Ontario Regulation 429/07 and Ontario Regulation 191/11, respectively.

The provision of care and services to persons with disabilities is integrated wherever possible throughout the hospital. Persons with disabilities are given an opportunity equal to that given to others, to obtain, use or benefit from the care, services and facilities provided by and on behalf of the organization.

LHSC also strives to provide an accessible environment for staff and affiliates.

PROCEDURE

1. Use of Service Animals and Support Persons

- 1.1. Persons with disabilities may be accompanied by their service animals to parts of LHSC's premises that are open to the public and other third parties.
- 1.2. Where there is a need to exclude a service animal from part of the premises (e.g. for infection control reasons, sound associated with MRI), staff/affiliates will ensure other measures are available to enable the person with a disability to obtain, use and benefit from LHSC's care and services. In these circumstances, the person using a service animal is expected to make arrangements for the service animal to be supervised.
- 1.3. Persons with disabilities may be accompanied by support persons on LHSC's premises, except where the safety of a person is at risk.

2. Use of Assistive Devices

- 2.1. LHSC makes reasonable efforts to ensure that persons with disabilities can use their assistive devices when accessing care and services.

3. Notice of Temporary Disruptions

- 3.1. LHSC will provide public notice when LHSC's facilities, amenities or services are temporarily unavailable, or when they are anticipated to be unavailable, including on the external website and at conspicuous locations near the disruption.
- 3.2. Notices must contain information about the reason for the disruption, its anticipated duration, and a description of available alternative services.

4. Accessibility Training

- 4.1. LHSC provides applicable accessibility and human rights training to all staff/affiliates, as well as those who participate in the development or approval of policies, practices and procedures governing the provision of care and services to the public.
- 4.2. Training is provided as soon as feasible after a person is hired or assigned to a new role.
- 4.3. A record of dates on which the training was provided is maintained, including the names of participants, and the number of people who participated.

5. Customer Feedback

- 5.1. LHSC responds to feedback from persons with disabilities about accessibility concerns obtained through various channels, including in person, and by mail, email or telephone.

6. Preparation of an Accessibility Plan

- 6.1. In compliance with the [Integrated Accessibility Standards](#), the Accessibility Working Group through consultations with stakeholders, produces a multi-year accessibility plan that includes:
 - 6.1.1. A report on the measures LHSC has taken to identify remove and prevent barriers to persons with disabilities,
 - 6.1.2. A report on the measures LHSC intends to take in the upcoming years to identify, remove and prevent barriers to persons with disabilities,
 - 6.1.3. A list of the by-laws, policies, programs, practices and services that will be reviewed in the upcoming years to identify barriers to persons with disabilities
 - 6.1.4. All other information that the regulations prescribe for the purpose of the plan, and
 - 6.1.5. The plan reviewed and updated at least once every 5 years, with a status report prepared and posted on the website annually.

7. Notice of Availability of Documents

- 7.1. LHSC provides public notice that information and communication, as required by the [Accessibility Standards for Customer Service \(O. Reg. 429/07\)](#) and the [Integrated Accessibility Standards \(O. Reg. 191/11\)](#), are available upon request in accessible formats.

8. Format of Documents

- 8.1. Reasonable efforts are made to ensure documents, as required by the [Customer Services Regulation](#) and the [Integrated Accessibility Standards](#), are in a format that meets the needs of the person requesting the document.

9. Reporting

- 9.1. LHSC maintains policies, procedures and other documents to demonstrate compliance with [Accessibility Standards for Customer Service \(O. Reg. 429/07\)](#) and the [Integrated Accessibility Standards \(O. Reg. 191/11\)](#).
- 9.2. LHSC files an Accessibility Compliance Report with the Accessibility Directorate of the Ontario Government as required.

10. Workplace Emergency Response Information

- 10.1. LHSC provides emergency procedures and public safety information to members of the public in accessible formats, upon request.
- 10.2. LHSC provides individualized emergency response information to staff/affiliates who self-identify as having disabilities. Completion of personal emergency response checklists accompany individualized evacuation plans for staff/affiliates with disabilities. These plans will be shared with the staff/affiliate, his/her leader, Security and assistants named in the plan.

11. Transportation Services

- 11.1. Where applicable, LHSC provides accessible transportation services or equivalent services upon request.

12. Procurement or Acquisition of Goods, Services and Facilities

- 12.1. LHSC incorporates accessibility criteria and features when procuring, acquiring or designing goods, services and facilities, including self-service kiosks.

13. LHSC Internet Websites and Web Content

- 13.1. As of 2014, all new internet websites and web content conforms with [Web Content Accessibility Guideline Overview \(WCAG\) 2.0, Level A](#), excluding live captioning and pre-recorded audio descriptions.

14. Recruitment

- 14.1. Staff/affiliates and the public are notified about the availability of accommodation for applicants with disabilities in recruitment processes.
- 14.2. Once applicants are selected in assessment process, applicants are notified that accommodations are available upon request in relation to materials or processes to be used. If requested, applicants are consulted regarding necessary arrangements to account for accessibility needs. (Refer to [Recruitment and Job Vacancies \(Non-Union\) Policy](#).)
- 14.3. Offers of employment include the notification to successful applicants of the LHSC [Workplace Accommodation Policy](#).

15. Accommodation

- 15.1. Staff/affiliates are informed of policies used to support staff/affiliates with disabilities, including the [Workplace Accommodation Policy](#).
- 15.2. Individualized accommodation plans are created for staff/affiliates with disabilities.
- 15.3. Return-to-work plans are created for those who have been absent from work due to a disability and require disability-related accommodations in order to return to work.
- 15.4. Accessibility needs of staff/affiliates with disabilities, as well as individual accommodation plans, are taken into account when redeploying staff/affiliates with disabilities.

16. Performance Management

- 16.1. Accessibility needs of staff/affiliates with disabilities, as well as individual accommodation plans, will be considered during the performance management process.

17. Career Development and Advancement

- 17.1. Accessibility needs of staff/affiliates with disabilities, as well as individual accommodation plans, will be considered when providing career development and advancement to its staff/affiliates with disabilities.

18. Built Environment

- 18.1. For new construction and major changes to existing features of its buildings, LHSC will adhere to the [Ontario Building Code, Ontario Regulation 332/12](#) as well as adopt the amendment, [Ontario Regulation 368/13](#) which focuses on accessibility.
- 18.2. For new construction and major changes to existing features of public spaces, LHSC will adhere to the design requirements outlined in the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the following: recreational trails, outdoor public eating areas, outdoor play spaces, outdoor paths of travel, accessible parking, service-related elements like service counters, fixed queuing lines and waiting areas.

DEFINITIONS

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

Accessible 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 with a hospital appointment (e.g. physicians, midwives, dentists),
- 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 – Assistive devices are intended to enable people with physical disabilities to increase their independence. There are more than 8000 types of assistive devices such as equipment or supplies in the following categories:

- Prostheses,
- Wheelchairs/mobility aids and specialized seating systems,
- Enteral feeding supplies,
- Monitors and test strips for insulin-dependent diabetics,
- Insulin pumps and supplies,
- Hearing aids,
- Respiratory equipment,
- Orthoses (braces, garments and pumps),
- Visual and communication aids, and
- Oxygen and oxygen delivery equipment such as concentrators, cylinders, liquid systems and related supplies, such as masks and tubing.

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.

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](#).

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 different 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.

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 Policies and Resources

[LHSC Accessibility Intranet Site](#)

[Documenting and Managing Patient/Family Compliments and Complaints Policy](#)

[Recruitment and Job Vacancies \(Non-Union\) Policy](#)

[Workplace Accommodation Policy](#)

Other Resources

[Ministry of Health and Long Term Care - Assistive Devices Program](#)

[Web Content Accessibility Guideline Overview \(WCAG\)](#)