

| Accessibility: Providing a Barrier-Free Environment at CHEO |                                     |                    |
|---|-------------------------------------|--------------------|
| For Policy Office Use Only                                  |                                     |                    |
| Administrative Clinical                                     |                                     | Policy Number: 225 |
| Approved By: Exec Team                                      | Original Date: January 2013         |                    |
| Approval Date: November 26, 2019                            | Revised Date(s): August 2019        | Version: 2         |
| Effective Date: November 26, 2019                           | Next Review Date: November 26, 2023 |                    |

All Rights Reserved. This is a CONTROLLED document for internal use only.

Any documents appearing in paper form are not controlled and should ALWAYS be checked against the electronic version prior to use.

#### **Policy Sponsor**: People, Strategy & Performance

Scope/Impact: This policy applies to all CHEO employees, medical staff, volunteers, students, contractors and all others who provide goods, services or facilities on behalf of CHEO.

Keywords: Disability, Accessibility

#### 1. PURPOSE:

This policy outlines the measures that the CHEO utilizes to promote accessibility for people with disabilities in compliance with the Accessibility for Ontarians with Disabilities Act, 2005.

#### 2. POLICY:

CHEO is committed to meeting the accessibility needs of persons with disabilities in a timely manner that respects their dignity and independence.

CHEO will, whenever possible and reasonable, implement measures to identify and remove barriers to access its facilities, policies, programs, practices, and services, for patients, their family members, staff, health care practitioners, volunteers and members of the community. CHEO will continue to foster and endorse attitudes and behaviours that eliminate barriers for persons with disabilities.

This policy is consistent with AODA, 2005 and the Accessibility Standards for Customer Service, Ontario Regulation 429/07. It is supported by the annual update of the Accessibility Plan, or changes as required.

#### 3. **RESPONSIBILITIES**:

#### 3.1 Questions about this policy

Questions about the purpose or content of this policy should be referred to the Chair of the Accessibility Committee

#### 3.2 Feedback process

Feedback regarding the way CHEO provides services to people with disabilities can be made verbally, through email or written documentation. All feedback will be directed to the Patient/Family Representative and addressed according to CHEO's Compliments and Concerns policy.

#### 3.3 Modifications to this or other policies

In order to respect and promote the dignity and independence of people with disabilities, no changes will be made to this policy before considering the impact on people with disabilities. All CHEO policies will be reviewed to ensure content respects and promotes the dignity and independence of people with disabilities.

#### 3.4 Staff responsibilities

Staff will be responsible for:

- identifying their need for accommodation and accessibility supports to Occupational Health and Safety in emergencies or for completion of employment duties.
- requesting information/documentation in a different, more accessible format, as needed.
- maintaining an awareness about Emergency Preparedness policies and plans as posted on CHEOnet and in Emergency Preparedness Binders at designated stations throughout hospital, as well as any individualized emergency response information they are provided with



# 4. PROCEDURE:

This overarching policy strives to achieve compliance with the *Integrated Accessibility Standard Requirements* (IASR, O.Reg. 191/11) developed under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). Compliance will be achieved in accordance with the schedule set out in the IASR, through the following directives:

#### 4.1 General Standards

<u>Accessibility Policies and Planning:</u> CHEO's accessibility policies and multi-year accessibility plan outlines the ways CHEO will prevent and remove barriers and meet the requirements of the standards developed under the AODA on an ongoing basis.

The multi-year plan will be:

a. Reviewed and updated at least every five years, and

b. Established, reviewed and updated in consultation with persons with disabilities and CHEO's Accessibility Committee.

An annual status report on the progress of measures taken to implement the multi-year accessibility plan will be prepared for the Executive Team. The multi-year accessibility plan and accompanying status report will be posted to CHEO's website and provided in an accessible format, upon request.

<u>Procurement/Self-Service Kiosks:</u> Accessibility criteria and features will be incorporated when procuring or acquiring goods, services, facilities and self-service kiosks. If it is not practicable to do so, staff will provide an explanation, upon request.

<u>Training:</u> All CHEO employees, medical staff, students and volunteers will be trained in accordance with the regulations of IASR and on the *Ontario Human Rights Code* as it pertains to persons with disabilities. Ongoing training will be provided to new employees as soon as practicable. If any changes are made to this policy or the requirements, training will be provided. CHEO will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

#### **Customer Service Standards**

<u>Supports persons, assistive devices and service animals:</u> As much as possible, use of patients' personal assistive devices will be encouraged to promote access, accompaniment by a support person or use of a service animal will be permitted, and additional supports will be provided as needed and as appropriate. Please also refer to CHEO Customer Service Providing Services to People with Disabilities Policy (218), and CHEO Pet Therapy policy.

<u>Notice of temporary disruption</u>: CHEO will provide customers with notice in the event of a planned or unexpected disruption of facilities or services usually used by people with disabilities. They will be posted at the location as well as on the CHEO website following the hospitals' Media Relations Procedure for notifying the public. It will include information about the reason and anticipated duration of disruption and details of alternative services or facilities, if available.

#### Information and Communication Standards

<u>Emergency Information</u>: CHEO will post an "in case of emergency" information sheet in public areas of the hospital. CHEO will provide emergency procedures, plans or public safety information (including the emergency preparedness manual) in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

<u>Feedback:</u> CHEO has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports, upon request. CHEO will notify the public about the availability of accessible formats and communication supports.

<u>Accessible Formats and Communication Supports:</u> CHEO will, upon request, provide or arrange for the provision of accessible formats or communication supports for people with disabilities. This will be done in consultation with the person making the request, in a timely manner that takes into account the person's accessibility needs and, where applicable at a cost that is no more than the regular cost charged to other persons.

# CHEO

<u>Websites and Web Content:</u> Internet websites and web content controlled directly by CHEO or through a contractual relationship that allows for modification of the product will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the Information and Communication Standards.

<u>Educational and Training Resources and Materials:</u> Upon request, CHEO will provide educational and training resources and materials in an accessible format that takes into account the accessibility needs due to a disability of the person to whom the material is to be provided.

<u>Training to Educators:</u> CHEO is committed to providing accessibility awareness training related to accessible program/course delivery and instruction to all educators. CHEO will maintain a record of the dates when the training is provided and the number of individuals to whom it was provided.

<u>Producers of educational or training material:</u> Upon request, CHEO will create accessible or conversion ready versions of the printed material available in accordance with the schedule set out in the Information and Communication Standards. This includes, but is not limited to orientation material and online learning modules.

<u>Libraries of educational and training institutions:</u> In accordance with the schedule set out in the Information and Communication Standards, CHEO will provide, procure or acquire by other mean an accessible or conversion ready format or print, digital or multimedia resources, or materials for a person with a disability, upon request. This policy does not apply to special collections, archival material, rare books and donations.

# 4.2 Employment Standards

<u>Workplace Emergency Response Information:</u> CHEO will provide individualized workplace emergency response information/plan to employees who have a disability, if the disability is such that the individualized information/plan is necessary and the employer is aware of the need for accommodation as disclosed/identified by the employee. This plan will be provided as soon as practicable and will be reviewed in accordance with this requirement of the AODA. The emergency information will be revisited if the employee moves work locations, if their accommodation needs are reviewed or if CHEO's emergency procedures are reviewed.

Employment: CHEO will strive to create an accessible work environment for all employees across the employment life cycle in accordance with the requirements and timelines set out in the Employment Standards and existing requirements under the *Ontario Human Rights Code* to accommodate people with disabilities. This includes, but is not limited to general recruitment, assessment or selection, performance management, return to work, redeployment, career development and individual accommodation plans.

# 4.3 Transportation Standards

<u>Transportation services:</u> CHEO will provide accessible transportation vehicles or an equivalent transportation service to accommodate people with disabilities who are eligible to use the services, upon request.

# 4.4 Design of Public Spaces Standards

<u>Design of public spaces:</u> CHEO will ensure that new and redeveloped exterior paths of travel, parking spaces, service counters, and waiting areas will meet minimum technical requirements as outlined by the IASR. CHEO's accessibility plan will include procedures for maintenance of these spaces, and for handling temporary disruptions to service caused by blocked access to these spaces.

# 5. CROSS-REFERENCES:

CHEO Customer Service <u>Providing Services to People with Disabilities (Policy No. 218)</u> CHEO Emergency Preparedness Manual Service Animals (Policy No. 219) Early and Safer Return to Work (ESTRW) Accommodation (Policy No. 095) Health and Safety (Policy No. 300) Procurement: Equipment, Supplies and Services (Policy No. 306) Recruitment and Selection at CHEO-OCTC (Policy No. 303)

# 6. REFERENCES:

O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS under Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 <u>https://www.ontario.ca/laws/regulation/110191</u>



O. Reg. 429/07: ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE filed July 27, 2007 under Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 <u>https://www.ontario.ca/laws/regulation/r07429</u> About the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) https://www.mcss.gov.on.ca/documents/en/mcss/publications/accessibility/AboutAODAWeb20080311EN.pdf

How to make customer service accessible https://www.aoda.ca/how-to-make-customer-service-accessible/

Accessibility laws : https://www.ontario.ca/page/accessibility-laws

ONTARIO REGULATION 429/07 made under the Accessibility for Ontarians with Disabilities Act, 2005. http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws\_src\_regs\_r07429\_e.htm

# 7. DEFINITIONS:

**Accessible/Accessible Format:** Provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached, or entered; obtainable. May include, but is not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**Accessibility Plan:** A document approved by CHEO Accessibility Committee and made available to the public that indicates the hospital's strategy to identify, remove and prevent barriers to access for people with disabilities and meet requirements under the AODA regulations.

Accessibility Standard: A rule that persons and organizations must follow to identify, remove and prevent barriers to accessibility.

**Accommodation/:** Special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

**Assistive Devices:** Supports made available by providers 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, Telephone Teletypes (TTY) to communicate with clients who are deaf, hard of hearing, have speech impairments or are deaf-blind.

**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 activities of daily living and allow access to hospital services. For example, patient-owned equipment such as power-mobility devices (power wheelchairs or scooters).

**Barrier:** Anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including physical, architectural, information and communications, attitudinal, technological, policy or practice barriers.

**Communication Support:** May include, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications;

**Conversion Ready:** An electronic or digital format that facilitates conversion into an accessible format.

Customer: includes patient, family, visitors, staff and physicians.

#### Disability: As per AODA, disability means,

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,

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, 1997*;

The definition includes disabilities of different severity, visible and non-visible disabilities, and disabilities the effects of which may come and go.

**Equivalent transportation service:** Transport service of similar quality to that provided to others who use the service. The equivalent service would have the similar fares, schedules and routes.

Goods: Items, commodities or related deliverables that are consumed during the provision of service or care.

**Guide Dog:** Defined in section 1 of the *Blind Persons' Rights Act* as a dog trained as a guide for a blind person and having the qualifications prescribed by the regulation.

**Kiosk**: An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Patient: Encompasses everyone who receives health services across the continuum of care at CHEO

**Service Animal**: An animal described in subsection (9) of the *Blind Persons' Rights Act*. as a service animal for a person with a disability (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

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.

**Staff:** All employees (permanent full time, part time, casual), physicians, volunteers, students, contractors and affiliates.

**Visitor:** Any individual who is not staff or a patient, who is on CHEO property or who is contacting a CHEO staff member in their work capacity.

Web Content Accessibility Guidelines: means the world wide web consortium, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0.

Workplace: "any land, premises, location or thing at, upon, in or near which a worker works" (Occupational Health and Safety Act, R.S.O. 1990, c. O.1).



# Appendix A - Sample Document for Notifying the Public Regarding Disruptions in Service



