

**Accessibility Policy**

Approval: Senior Leadership Team

Approval Date: 12-APR-2022

Effective Date:

13-APR-2022

**SCOPE:**

This policy and procedure applies to all employees of the Royal Victoria Regional Health Centre (RVH) as well as professional staff with RVH privileges (i.e., medical, dental, midwifery, and extended class nurses), volunteers, students, and contractors. These individuals shall be referred to collectively as Workers herein. The requirements apply whether working on RVH property or working on behalf of or representing RVH elsewhere.

**POLICY STATEMENT:**

It is the policy of RVH to ensure equal access and participation for people with disabilities. RVH is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. RVH believes in integration and is committed to meeting the needs of people with disabilities in a timely manner. RVH 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.

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

RVH 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.

RVH is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.

Our policies and procedures that relate to accessible customer service are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

**DEFINITIONS:**

**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

## **Accessibility Policy**

**Customer:** for the purpose of this policy and procedure, a customer may be a patient, visitor or member of the public accessing services to which [Accessibility for Ontarians with Disabilities Act, 2005](#) and its accessibility standards apply

**Mobility aid:** means a device used to facilitate the transport, in a seated posture, of a person with a disability

**Mobility assistive device:** means a cane, walker or similar aid

**Service animal:** as defined in the Royal Victoria Regional Health Centre (2019). Policy and Procedure, *Pet Visitation*, Service Animals are animals (over a year of age) that have been trained to perform tasks that assist people with disabilities on a daily basis. In most situations the animal is a dog. The animal has documentation showing that it has been trained through an accredited training school and is required by the patient for assistance.

## **PROCEDURE:**

### **Training**

1. RVH is committed to training all Workers, so that people with disabilities are treated in a way that allows them to maintain their dignity and independence. RVH will do so by removing and preventing barriers to accessibility, through our customer service policies, learning modules and other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.
2. In addition, RVH will train:
  - a. all persons who participate in developing the organization's policies; and
  - b. all Workers as defined by this policy
3. Training of our Workers on accessibility relates to their specific roles.
4. Training includes:
  - a. purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
  - b. RVH policies related to the Customer Service Standards
  - c. how to interact and communicate with people with various types of disabilities
  - d. how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
  - e. 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  
These may include, but are not limited to:
    - mobility assisted devices
    - lifts, which raises or lowers people who use mobility devices
    - communication supports

## **Accessibility Policy**

- accessible interactive kiosk
  - f. what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities
5. RVH trains every Worker as soon as practicable after being hired and provides training in respect of any changes to the policies.
  6. RVH maintains records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

### **Assistive Devices**

1. People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.
2. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.
3. RVH ensures that our Workers are trained and familiar with various assistive devices that are on site or that are provided that may be used by customers with disabilities while accessing our goods, services or facilities.

### **Communication**

1. RVH will work with the individual and/or their family to determine what their individual communication needs are.
2. RVH communicates with people with disabilities in ways that take into account their individual needs. This may include the following:
  - a) signage and wayfinding
  - b) accessing sign language interpretive services
  - c) portable communication devices
  - d) non-verbal communication aids
  - e) reading written information to a person directly
  - f) large print
  - g) text transcripts of audio or visual information
  - h) handwritten notes instead of spoken word
  - i) information written in plain language
  - j) an electronic document formatted to be accessible for use with a screen reader

### **Service Animals**

1. RVH welcomes Service Animals.

## **Accessibility Policy**

2. 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.
3. When RVH cannot easily identify that an animal is a Service Animal, our Workers 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. A Regulated health professional recognized with the ability to confirm these needs: is defined as a member in good standing from 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.
4. If Service Animals are prohibited by another law or by the Royal Victoria Health Centre (2019). Policy and Procedure, *Pet Visitation*, RVH will do the following to ensure people with disabilities can access our goods, services or facilities:
  - a) explain why the animal is excluded
  - b) discuss with the customer another way of providing goods, services or facilities
5. Service Animals are prohibited from the areas listed in the Royal Victoria Health Centre (2019). Policy and Procedure, *Pet Visitation*.
6. In addition to Service Animals, The Royal Victoria Regional Health Centre (2019). Policy and Procedure, *Pet Visitation* also supports the use of animals for therapy, and the visitation of patient pets.

## **Support Persons**

1. Support persons identified by a person with a disability are able to accompany them while at RVH as per Royal Victoria Regional Health Centre (2021). *Policy and Procedure, Patient Rights and Responsibilities*.
2. In certain cases, RVH might require a person with a disability to be accompanied by a support person for the health or safety reasons of:
  - a) the person with a disability
  - b) others on the premises
3. Before making a decision, RVH will:
  - a) consult with the person with a disability to understand their needs
  - b) consider health or safety reasons based on available evidence

## **Accessibility Policy**

- c) determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

### **Notice of Temporary Disruption**

1. In the event of a planned or unexpected disruption to services or facilities for persons with disabilities, RVH will notify the applicable persons promptly using clearly posted signs which will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if applicable. This could include:
  - a) closures of Entrances and barrier free paths of travel for maintenance or construction
  - b) unplanned downtime of information technology

### **Feedback Process**

1. RVH welcomes feedback on how accessible customer service is provided. Customer feedback will help us identify barriers and respond to concerns.
2. RVH ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request. Feedback may be provided by contacting the RVH Patient and Family Experience Office by phone at (705) 728-9090 ext. 44510 or by email at [patientexperience@rvh.on.ca](mailto:patientexperience@rvh.on.ca)
3. RVH ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.
4. All feedback, including complaints, will be handled in the following manner:
  - a) Once the Patient and Family Experience Office receives feedback, in writing, or by telephone, they will connect, if able with the person who submitted the feedback to understand all the details. If a concern/inquiry is related to a specific patient experience that requires a review, the RVH Patient and Family Experience Office will speak with the patient directly (or their Substitute Decision Maker/Power of Attorney, if incapable) to obtain their consent to access the patient's information.
  - b) RVH Patient and Family Experience Office will begin the review by communicating with the appropriate staff, physicians and leaders, as well as reviewing the patient record to better understand the background. The timeline for this step varies depending on the nature of the concern/inquiry.
  - c) RVH Patient and Family Experience Office will identify the issues and work with the person who provided the feedback and/or those involved in the experience to identify the best solution, receive answers to the questions,

## **Accessibility Policy**

and determine how to improve in the delivery of service and care in the future.

5. Persons submitting feedback can expect to hear back in 2 days.

### **Notice of Availability of Documents**

1. RVH notifies the public that documents related to accessible customer service, are available upon request by posting a notice on the RVH website <https://www.rvh.on.ca/patients-visitors/accessibility/>
2. RVH will provide these documents in an accessible format or with communication support, on request. RVH will consult with the person making the request to determine the suitability of the format or communication support. RVH will provide the accessible format in a timely manner and, at no additional cost.

### **Self-service Kiosks**

1. RVH incorporates accessibility features and considers accessibility when designing, procuring or acquiring self-service kiosks.

### **Procurement**

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

### **Information and Communications**

1. RVH has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.
2. RVH communicates with people with disabilities in ways that take into account their individual needs. Upon request, RVH 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; and
  - b) at a cost that is no more than the regular cost charged to other persons
3. RVH 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; and



## **Accessibility Policy**

- b) a summary of the unconvertible information or communications
- 4. RVH notifies the public about the availability of accessible formats and communication through communication with to our Patient and Family Experience Office and through information available on the RVH website.
- 5. RVH meets internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

## **Employment**

- 1. RVH notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring.
- 2. RVH notifies job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. RVH will consult with applicants to arrange for suitable accommodation.
- 3. RVH notifies successful applicants of policies for accommodating employees with disabilities when making offers of employment. Upon offer of employment, RVH notifies successful applicants of the process for a pre-employment assessment to facilitate individual arrangements, in the form of an individual accommodation plan, prior to the start date of a worker with disabilities, or as soon as practicable after they begin employment.
- 4. Individual accommodation plans shall,
  - a) if requested, include any information regarding accessible formats and communications supports provided
  - b) if required, include individualized workplace emergency response information
  - a) identify any other accommodation that is to be provided
- 5. RVH notifies Workers that supports are available for those with disabilities as soon as practicable after they begin their employment.
- 6. RVH will provide updated information to Workers 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.
- 7. RVH will consult with Workers when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. RVH 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
- 8. Where needed, RVH will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, RVH will provide workplace emergency information to a designated person who will coordinate providing assistance to that employee during an emergency.

## **Accessibility Policy**

9. RVH will provide the customized emergency information as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.
10. RVH will review the individualized workplace emergency response information:
  - a) when the employee moves to a different location in the organization
  - b) when the employee's overall accommodations, needs, or plans are reviewed; and
  - c) when the employer reviews its general emergency response policies
11. RVH has a written process to develop individual accommodation plans for employees.
12. RVH has 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.
13. Personal Health Information and Personal Information collected, used and maintained at RVH is treated in accordance with the *Freedom of Information and Protection of Privacy Act (FIPPA)*, the *Personal Health Information Protection Act (PHIPA)* and any other legislation as applicable. The process for the development of documented individual accommodation plans will ensure accurate and appropriate information gathering, establish appropriate information request processes for workers and their leaders, and ensure due diligence and legislative compliance regarding confidentiality of medical information.
14. If it is determined that accommodation is not supported, RVH will notify the employee in writing, or in a format that takes into account the employee's accessibility needs as required.
15. Individual accommodation plans will be in a format that takes into account the employee's accessibility needs due to disability.
16. At the request of an employee with a disability, alternate arrangements may be accommodated for performance management, career development and redeployment processes.

## **Design of Public Spaces**

1. RVH will meet accessibility laws when building or making major changes to public spaces. Our public spaces include:
  - a) Recreational trails/beach access routes
  - b) Outdoor public eating areas like rest stops or picnic areas
  - c) Accessible off-street parking
  - d) Service-related elements like service counters, fixed queueing lines and waiting areas
2. RVH puts procedures in place to prevent service disruptions to the accessible parts of our public spaces.



**Accessibility Policy**

**Changes to Existing Policies**

1. RVH will modify or remove any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities.
2. This document is publicly available. Accessible formats are available upon request.

**CROSS REFERENCES:**

Royal Victoria Regional Health Centre (2017). Policy and Procedure, *Disability Accommodation*

Royal Victoria Regional Health Centre (2018). Policy and Procedure, *Family Presence Policy*

Royal Victoria Regional Health Centre (2017). Policy and Procedure, *Modified Work Policy*

Royal Victoria Regional Health Centre (2019). Policy and Procedure, *Occupational Health Records*

Royal Victoria Regional Health Centre (2021). Policy and Procedure, *Records Retention*

Royal Victoria Regional Health Centre (2021). Policy and Procedure, *Patient Rights and Responsibilities*

Royal Victoria Regional Health Centre (2019). Policy and Procedure, *Pet Visitation*

Royal Victoria Regional Health Centre (2020). Policy and Procedure, *Working Remotely Policy*

**REFERENCES:**

*Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*

*Integrated Accessibility Standards Regulation (Ontario Regulation 191/11)*