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Subject: Accessibility Policy			<i>This policy replaces the OSMH Accessibility Policy v2 – Jan 2010</i> Date Effective: July 22, 2021 Date Reviewed: Annually	
Issued by: OSMH Senior Team		Approved by: OSMH Senior Team		

PURPOSE:

The purpose of this policy is to outline practices and procedures in place at OSMH to help identify and remove barriers that impede a person's ability to access care and services, and ensure compliance with all legislated accessibility requirements.

POLICY:

OSMH is committed to preventing, identifying and removing barriers that impede the ability of people with disabilities to access care and services. This includes patients, families, staff, physicians, volunteers and members of our community.

In June, 2005 the Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA). The purpose of this enhanced Act is to develop, implement and enforce standards of accessibility for all Ontarians. OSMH's Accessibility Policy is consistent with the AODA, the Accessibility Standards for Customer Service, and the Integrated Accessibility Standards (O. Reg. 191/11) passed on July 1, 2011.

These regulations set accessibility standards related to customer service, information and communication, employment, transportation and the design of public spaces. All public sector organizations, including OSMH, are required to comply with the requirements as applicable. All people, regardless of disability, have equal right of access to all goods, services and facilities provided by OSMH. OSMH is committed to:

1. Providing goods, services and facilities in a manner that:
 - i. Maintains the dignity, autonomy, respect, privacy and safety of persons with disabilities; and
 - ii. Is inclusive, sensitive and responsive to unique needs.
2. Integration and equal opportunity;
3. Preventing and removing barriers to accessibility; and
4. Meeting the standards set out under the Accessibility for Ontarians with Disabilities Act, 2005.


DEFINITIONS:

Accessibility — The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.

Assistive Devices and Measures: Assistive devices and measures are supports to improve access to care for persons 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, text, Telephone Teletypes (TTY) to communicate with clients who are deaf, deafened, hard of hearing, have speech impairments or are deaf-blind (Guide to the Accessibility Standards for Customer Service, Ontario Regulation). During the pandemic, OSMH also provided clear face masks to enable lip reading.

Barrier — Barriers are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.

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Disability: According to the Ontario Human Rights Code, a "Disability" is defined as:

5. 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,
6. A condition of mental impairment or a developmental disability,
7. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
8. A mental disorder, or
9. 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 as well as non-visible disabilities, and disabilities the effects of which may come and go. This definition describes common disabilities and is not considered exhaustive.


Emotional Support Animals: Emotional support animals provide comfort and security; however, they do not have training for specific tasks. Therefore, emotional support animals do not formally qualify as service animals under the AODA. At OSMH, an Emotional Support Animal will be considered a "service animal" if the patient/visitor provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability, provides documented proof of vaccination and training, and is permitted at the discretion of the unit manager or delegate based on a risk analysis.

Personal Assistive Devices: For the purpose of this policy, Personal Assistive Devices are personal supports used by persons living with disabilities that enable them to carry out the activities of daily living and support access to services. Patient-owned equipment such as power-mobility devices (power wheelchairs or scooters) are regarded as Personal Assistive Devices.

Service Animals: Any animal individually trained to assist people with disabilities in the activities of living, to enhance quality of life, and mitigate their disabilities. These animals provide persons living with disabilities a variety of services, including but not limited to:

10. Guiding individuals with visual impairments
11. Alerting individuals who are deaf, deafened or hard of hearing to sounds
12. Alerting to seizures
13. Opening/closing doors
14. Retrieving items
15. Pulling a wheelchair

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Most service animals are dogs and can be of any breed or size. A service animal is afforded access to all places the public is invited when accompanying their human partner. A service animal is not considered a “pet” because it is specially trained to help a person manage their disability or used to minimize the impacts of the disability.

Support Person: A "Support Person" accompanies a person living with a disability, in order to assist with communication, mobility, personal care or medical needs or with access to goods or services. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure. A Support Person may be a paid professional, a volunteer, family member or friend of the person with a disability ([Guide to the Accessibility Standards for Customer Service, Ontario Regulation](#)).

PROCEDURE AND COMPLIANCE

OSMH will ensure we are identifying, preventing and removing barriers to access for people living with disabilities through procedures in the following areas:

General Procedures

16. Enabling and accommodating people living with disabilities to access our goods and to utilize our services.
17. Communicating with a person with a disability in a manner that takes into account their disability and communication preference.

Formatting of Documents


18. When providing a copy of a document to a person with a disability, OSMH shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support.
 - 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
19. OSMH shall consult with the person making the request in determining the suitability of an accessible format or communication support.

Support Persons, Service Animals and Assistive Devices

Supports and encourages the presence and use of accessibility Support Persons, service animals and assistive devices are embraced with consideration taken for infection control and patient safety.

20. Allowing people living with disabilities to bring their guide dog or service animal with them to areas of the premises that are open to the public.
21. Permitting people living with disabilities who use a Support Person to accompany them and ensuring that a person living with a disability has access to their Support Person while on our premises.

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22. Encouraging people living with disabilities to use their own personal assistive devices to improve access to OSMH's goods and services.

Training

OSMH is committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, OSMH will train:

- i. All persons who participate in developing the organization's policies; and
- ii. All other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles. Training includes:


- i. Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards.
- ii. Our policies related to the Customer Service Standards
- iii. How to interact and communicate with people with various types of disabilities
- iv. How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- v. 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 include:

- i. Wheelchairs
- ii. Texting software
- iii. Electronic devices used to enable translation, or amplification of sound
- iv. What to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

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Informing employees of Supports

OSMH shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. O. Reg. 191/11, s. 25 (1)

OSMH shall provide the information required under this section to new employees as soon as practicable after they begin their employment. O. Reg. 191/11, s. 25 (2)

OSMH shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. O. Reg. 191/11, s. 25 (3)

Documenting Individual Accommodation Plans

OSMH shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. O. Reg. 191/11, s. 28 (1). The process for the development of documented individual accommodation plans shall include the following elements:


23. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
24. The means by which the employee is assessed on an individual basis.
25. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
26. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
27. The steps taken to protect the privacy of the employee's personal information.
28. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
29. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
30. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. O. Reg. 191/11, s. 28 (2).

Individual accommodation plans shall,

- i. if requested, include any information regarding accessible formats and communications supports provided, as described in Informing Employees of Supports (above)
- ii. if required, include individualized workplace emergency response information, and
- iii. identify any other accommodation that is to be provided. O. Reg. 191/11, s. 28 (3).

Performance management

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In respect to performance management of its employees, OSMH shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. O. Reg. 191/11, s. 30 (1).

31. "performance management" means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success. O. Reg. 191/11, s. 30 (2).

Career development and advancement

In the provision of career development and advancement for its employees, OSMH shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. O. Reg. 191/11, s. 31 (1).

32. "career development and advancement" includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them. O. Reg. 191/11, s. 31 (2).

Redeployment

As part of our Redeployment strategy, OSMH shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. O. Reg. 191/11, s. 32 (1).


33. "redeployment" means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization. O. Reg. 191/11, s. 32 (2).

Notice of Accessible Service Interruption

OSMH will provide notice when facilities or services that people living with disabilities rely on to access our services are temporarily disrupted. In the event of a planned service disruption, notification will be provided in advance or as soon as possible. When necessary, appropriate alternative services will be provided. In the event of unplanned service disruption, notification will be provided as soon as possible after the disruption occurs. When necessary, appropriate alternative services will be provided. Notices of disruption shall be made publicly available as appropriate (e.g. OSMH website, social media channels) and shall include:

34. The name of the event/service;
35. The normal service location being impacted;
36. Alternate service locations;
37. Alternate service methods;
38. Hours of service availability;
39. Contact information; and
40. Any other information deemed appropriate to deliver a good or service.

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Encouraging Feedback

OSMH encourages and responds to feedback from patients/families, staff, physicians and volunteers. The hospital accepts feedback in a variety of formats, including email, telephone, mail and in-person. In addition, OSMH will ensure:

41. Communication supports are available to facilitate the feedback process upon request.
42. Every staff member is attentive to the concerns of patients/residents, their families and visitors and to resolve concerns related to accessibility. There are a number of strategies that are available to patients/families/ staff, physicians and volunteers to provide feedback regarding accessibility.
43. All information provided through our feedback process is available in accessible formats upon request. Upon being advised of a need for documents in accessible formats or communication supports, OSMH will work with the individual making the request to determine the most appropriate format or communication support. Where information cannot be converted to the format requested, OSMH will provide an explanation of the problem and a summary of the information.

Concerns related to accessibility shall be reported to Patient Relations and managed in accordance with applicable policies.

As part of a website redesign completed in 2019, OSMH meets internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.


Accessibility Committee and Accessibility Plan

44. OSMH, in consultation with persons living with disabilities, will establish and maintain a multi-year Accessibility plan.
45. This Plan will be reviewed and updated at least once every 5 years.
46. Each year, OSMH will prepare a status report of the measures taken to implement the strategies set out in the multi-year accessibility plan.
47. Both the multi-year Accessibility Plan and the annual status reports will be made publicly available through the OSMH website.

Procurement

48. OSMH considers accessibility when making decisions relating to the procurement or acquisition of goods, services, equipment, devices and facilities.
49. In particular, OSMH will incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

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Hiring and Recruitment

Ensuring that all open positions are recruited for in an inclusive manner, ensuring equal consideration and that accommodation is available in accordance with the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005

OSMH includes the following language in job postings:

“Orillia Soldiers’ Memorial Hospital is a respectful, caring, and inclusive workplace. We are committed to championing accessibility, diversity, equal opportunity and maintaining a barrier-free selection process for job applicants. Requests for accommodation can be made at any stage of the recruitment process providing the applicant has met the requirements for the open position. Applicants need to make their requirements known to the Human Resources department when contacted. All requests are handled confidentially.”

Accessible formats and communication supports for employees

Where an employee with a disability so requests it, OSMH shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,

- i. information that is needed in order to perform the employee’s job; and
- ii. information that is generally available to employees in the workplace. O. Reg. 191/11, s. 26 (1).


OSMH shall consult with the employee making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 26 (2).

Workplace emergency response information

OSMH shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability. O. Reg. 191/11, s. 27 (1).

50. If an OSMH employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, OSMH shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. O. Reg. 191/11, s. 27 (2).
51. OSMH shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee’s disability. O. Reg. 191/11, s. 27 (3).
52. OSMH shall review the individualized workplace emergency response information,
 - i. When the employee moves to a different location in the organization;
 - ii. When the employee’s overall accommodations needs or plans are reviewed; and
 - iii. When the employer reviews its general emergency response policies. O. Reg. 191/11, s. 27 (4).

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Associated Documents:

1. Management of Compliments and Complaints – [OSMH Policy](#)
2. Language Interpretation Services – [OSMH Policy](#)
3. SMS texting for patients in Emergency Department – OSMH Procedure
4. Audible, Visual and Tactile queuing for Main Registration – OSMH Procedure
5. [Accessibility for Ontarians with Disabilities Act, 2005](#)
6. [Guide to the Accessibility Standards for Customer Service, Ontario Regulation](#)
7. Recruitment and Selection of Staff – [OSMH Policy](#)

STANDARDS OF ACCESSIBILITY UNDER AODA

Customer Service: Service delivery to the public; also includes business practices, employee training.

Transportation: This standard needs to reflect a variety of environments, financial capabilities of users/providers and the differing modes of travel including conventional and specialized modes, and on-demand taxi services.

Information and Communication: Information and communications provided to the consumer or end-user through print, telephone, electronic devices, and in person; also includes publications and software applications.

Design of Public Spaces: Access to, from and within buildings and outdoor spaces; also includes counter heights, aisle and door widths, parking, signage, pedestrian access routes and signal systems.

Employment: Hiring and retaining employees; also includes employment practices, policies and processes such as job advertisements and interviewing.


PRINCIPLES OF CUSTOMER SERVICE

Dignity: Refers to policies, procedures and practices that treat a person with a disability as a client who is as valued and deserving of effective and full service as any other client. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services and show respect for these methods.

Independence: In some instances, independence means freedom from control or influence of others' freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor.

Integration: Integrated services are those services that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other clients. Integration means that policies, practices and procedures are designed to be accessible to everyone including people with disabilities. Sometimes integration does not serve the needs of all people with disabilities. In these cases, it is necessary to use alternate measures to provide goods or services. Alternate measures are ways of serving people that are not completely integrated into the regular business activities of the organization, for example, email.

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Equal Opportunity: Equal opportunity means having the same chances, options, benefits and results as others. In the case of services, it means that people with disabilities have the same opportunity to benefit from the way you provide services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or inconvenience.

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