PURPOSE, GUIDING PRINCIPLES AND DEFINITIONS

1.0 Background

The Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) is a provincial act with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Under the AODA, Ontario Regulation 429/07 entitled “Accessibility Standards for Customer Service” came into force on January 1, 2008. This Regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public. Designated public sector organizations, including the Mackenzie Health, must comply with this standard as of January 1, 2010.

1.1 Purpose

The following Mackenzie Health policies were prepared in accordance with the Accessibility Standards for Customer Service (Ontario Regulation 429/07):

- Accessibility – Customer Service
- Accessibility – Assistive Devices
- Accessibility – Use of a Support Person
- Accessibility – Service Animals

These policies address the following:

- the provision of goods and services to persons with disabilities;
- the use of assistive devices by persons with disabilities;
- the use of service animals by persons with disabilities;
- the use of support persons by persons with disabilities;
- notice of temporary disruptions in services and facilities;
- training;
- customer feedback regarding the provision of goods and services to persons with disabilities; and
- notice of availability and format of documents.

The Mackenzie Health accessibility policies are supported by this procedural document. The following procedures support these policies by outlining the detailed processes and accommodations pursuant to the policy. The supporting procedures include the following:

- Procedures for Customer Service and the Use of Assistive Devices
- Procedures for the Use of Service Animals
- Procedures for the Use of Support Persons
- Procedures for Providing Notice of Temporary Disruptions
• Procedures for Receiving Feedback

1.3 Guiding Principles

Mackenzie Health will use reasonable efforts to ensure that the provision of its goods and services are consistent with the following principles:

• goods and services are provided in a manner that respects the dignity and independence of customers with disabilities;
• the provision of the Mackenzie Health’s goods and services to patients and customers with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a customer with a disability to obtain, use or benefit from the organization’s goods or services;
• patients and customers with disabilities are given an opportunity equal to that of patients and customers without disabilities to obtain, use or benefit from Mackenzie Health’s goods and services.

1.4 Definitions

Accommodation:
The 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 customer’s unique needs.

Assistive Device:
A technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities. Assistive Devices include but are not limited to:

• physical assistive devices - cane, walker, wheelchair, electric scooters, grasping devices
• communicative Devices - hearing devices, laptop computers, personal data assistant (PDA), cell phones
• visual Aids - magnification devices, Braille devices, white canes, glasses
• medical Assistive Devices - personal oxygen tanks
  (Accessibility for Ontarians with Disabilities Act, 2005)

Customer:
Persons to whom the hospital provides goods and services and those who access the hospital facilities for the purpose of conducting business with the hospital.

Disability:
• 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;
Mackenzie Health – Accessibility Standards for Customer Service Procedures

- 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*.

**Guide Dog:**
A guide dog as defined in section 1 of the *Blind Persons Rights’ Act, (1990)*, is a dog trained as a guide for a blind person and having qualifications prescribed by the regulations under the *Blind Persons Rights’ Act, (1990)*.

**Service Animal:**
Any animal used by a customer with a disability for reasons relating to the disability where it is:
- readily apparent that the animal is used by the customer for reasons relating to his or her disability; or where the customer provides a letter from a physician or nurse confirming that the customer requires the animal for reasons relating to the disability;
- where the customer provides a valid identification card: and/ or
- training certificate from a recognized guide dog or service animal training school.

**Support Person:**
A person who accompanies a customer with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to goods or services. The support person could be a paid personal support worker, a volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications. *(Accessibility for Ontarians with Disabilities Act, 2005).*

**Telephone Device for the Deaf (TDD/TTY):**
The Telephone Device for the Deaf (TDD) or Teletypewriter (TTY) transmits a visual signal over the standard telephone line. This technology is available for individuals with severe to profound hearing loss or poor speech recognition ability. As one person types his or her message, the signal is transmitted along the telephone line and is decoded at the other end by the telephone receiver. It is necessary for both parties to have a system to communicate.

**Training:**
Training could be provided through workbooks, videos, handouts such as fact sheets or brochures at an orientation session, through a mandatory online module, in a classroom setting or other format. *(Compliance Manual: Accessibility Standards for Customer Service, Ontario Regulation 429/07 p. 28.)*
PROCEDURES FOR CUSTOMER SERVICE AND THE USE OF ASSISTIVE DEVICES

2.0 Introduction

Customers with disabilities may require certain accommodations to help them access the goods and services provided by or on behalf of Mackenzie Health. These accommodations may involve various forms of assistance, assistive devices or services and may include a patient or customer’s assistive device or one provided by the Hospital.

Examples include: providing assistance in completing a registration form for a patient, providing magnifiers to help with reading, or sign language interpretation service for patients who are deaf.

2.1 Providing Person Focused Care for People with Disabilities

When discussing accommodation needs, Hospital staff, physicians and volunteers should communicate in a clear manner that considers the customer’s disability and should exhibit appropriate behaviour towards customers who use service animals, support persons and/or assistive devices. All Hospital staff, physicians and volunteers should be familiar with the information contained in the brochure titled “Providing Person Focused Care for People with Disabilities” (Appendix A).

2.2 Requests for Accommodation including the Use of Assistive Devices or Services by Customers with Disabilities

a. Patient and Customer Responsibilities

In most situations, Mackenzie Health expects a person with a disability to take the initiative to request accommodation. Patients and customers with disabilities who require accommodations are encouraged to communicate their needs promptly to staff. Ideally, patients and customers will request accommodation to staff in the department responsible for the service the individual is seeking. Where this is not possible, requests may be made to any staff member who will then forward the request to the appropriate department. If an individual is unable to make a request without assistance, a parent or legal guardian or support person may assist the person in making the request.

b. Organizational Responsibilities in Initiating Customer Accommodation Requests

At times a customer with a disability may be unable, due to the nature of his or her disability, to identify or communicate accommodation needs. In situations where it is evident that the customer has a disability and there is a potential need for accommodation, staff or anyone working on behalf of Mackenzie Health may ask the individual if they require assistance accessing the hospital’s services. Staff will approach persons with disabilities and discuss their accommodation needs with an understanding of the need to respect their privacy regarding their disability and accommodation requests.
c. Determining Accommodations Solutions
When determining accommodation solutions for a patient or customer, staff may ask the customer for suggestions and for information directly related to their accommodation needs. Staff inquiries should only address the customer’s accommodation needs. Staff will avoid requesting personal or confidential information related to the customer or their disability, except where required (ie: by the primary healthcare provider).

Each request for accommodation will be reviewed on a case by case basis. If necessary, the accommodation may involve providing the service at another time, in another location, in another manner, providing assistive devices or equipment, or other reasonable measures. The accommodation provided must be reasonable and consider the customer’s disability. Hospital staff will give consideration to the patient’s preferences. However, the accommodation provided may not be the customer’s first choice of accommodation options.

d. Considerations for Determining Accommodation Requests
When determining the most appropriate form of accommodation, the Mackenzie Health will consider the following:

i) The cost of the accommodation;
ii) The availability and cost of alternative solutions;
iii) The likelihood that the accommodation will alter the nature of the goods or services provided by the hospital;
iv) The likelihood that the accommodation will negatively affect the ability of others to obtain, use or benefit from Mackenzie Health’s goods or services in their intended manner;
v) The likelihood that the accommodation will pose a risk to the health or safety of the customer with the disability or others;
vi) If an assistive device is suggested, the willingness and ability of the customer to use the particular assistive device, equipment or service;
vii) If an assistive device is suggested, the overall risk to the customer, or to others, with the use of the assistive device provided by Mackenzie Health.

2.3 Safe Operation of Assistive Devices
It is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times when accessing hospital goods and services.

2.4 Disagreements about Accommodation Solutions
In situations where staff, physicians, or volunteers and the patient disagree about an accommodation solution, including the use of assistive devices, the organization will work with the customer to find an agreeable solution. If an agreeable solution is not found, the customer will be referred to the Patient Concerns Resolution Process, the established forum for complaints relating to accessibility.
PROCEDURES FOR THE USE OF SERVICE ANIMALS

3.0 Introduction

Patients and customers with disabilities may require the assistance of service animals to help them obtain, use and access goods and services provided by or on behalf of Mackenzie Health. Customers with disabilities are permitted to enter premises Mackenzie Health owns or operates with their service animal and to keep the animal with them while on the premises, unless excluded by law or on the basis of medical or safety considerations. There are many types of service animals, including, but not limited to, guide dogs, seizure alert animals, hearing alert animals, and emotional support animals.

The following practices are required for situations where customers with disabilities require the assistance of a service animal while on property the hospital owns or operates.

3.1 Identifying Service Animals

a. Readily Apparent Service Animals
Hospital staff, physicians and volunteers will notice if the animal is a service animal by observing:

i) if the customer’s need for a service animal is obvious;
ii) if the customer’s need for a service animal is known to hospital staff;
iii) if the service animal is wearing a service animal vest or harness; or,
iv) if the service animal is observed assisting the customer.

b. Documents Identifying Service Animals
If staff, physicians or volunteers are uncertain whether the animal is a service animal, they may ask the patient for a letter from a physician or nurse explaining that they require the animal for reasons relating to a disability; or

c. Addressing Customers with a Service Animal
Hospital staff, physicians and volunteers should be aware that customers and patients who require the use of a service animal may be sensitive about discussing their need for a service animal. When approaching a customer or patient to ask if the animal is required for reasons related to a disability, hospital staff will:

i) make reasonable efforts to ask the customer in a discreet manner;
ii) ask the customer if the animal is required for reasons related to a disability, but will not ask for an explanation of the disability or the duties the animal serves; and,
iii) be aware that some customers who require the use of a service animal may not be familiar with the term “service animal” and may require an explanation of the term.

d. Service Animals in Training
An animal being trained to be a service animal may be permitted onto premises that Mackenzie Health owns or operates and to stay with their trainer, unless the animal is excluded by law or on
the basis of medical or safety considerations. Service animals in training are subject to the same considerations and exceptions given to service animals as outlined in this procedural document. These animals are often identified by wearing a training vest or possessing identification from a recognized guide dog or service animal training school.

3.2 Hospital Responsibilities

Mackenzie Health will ensure that staff, physicians, volunteers and others providing services on behalf of the organization:

i) permit service animals to enter premises owned or operated by the hospital unless the animal is excluded by law or on the basis of medical or safety considerations.
ii) permit customers with disabilities to keep their service animal with them while on hospital property; and,
iii) understand that service animals are working animals and therefore should not be distracted, spoken to or offered food.

3.3 Customer Responsibilities

Customers who require the assistance of service animals are responsible for them while on premises owned or operated by Mackenzie Health. Responsibilities include:

i) supervising and keeping the service animal in control at all times. Mackenzie Health staff are not required to handle service animals; and
ii) making certain the service animal is well-behaved and as unobtrusive as possible;
iii) ensuring that the service animal does not engage in behaviour that would threaten the health and/or safety of others.

3.4 Removal of Service Animals from Mackenzie Health Premises

Patients and customers may be asked to remove their service animal from hospital property for any of the following reasons:

Disruptive Behaviour:
A customer may be asked to remove their service animal if it displays unruly or disruptive behaviour. The hospital may decide to prohibit the animal from premises that Mackenzie Health owns or operates. If the customer takes effective remedial steps to correct the animal’s behavioural problems, the hospital may reconsider this decision.

Damage:
A customer may be asked to remove their service animal if it causes damage to persons or property. Customers and patients are responsible for any damage to persons or property caused by their service animal.
3.5 Legislation and By-Laws Governing the Exclusion of Animals

Customers with disabilities are permitted to enter premises that Mackenzie Health owns or operates with their service animal and to keep the animal with them unless the animal is excluded by law or on the basis of medical or safety considerations.

Guide dogs and other Service animals are not permitted where sterile procedures occur in accordance with the Health Promotion and Protection Act (1990) including but not limited to:

- operating rooms;
- minor procedure rooms or rooms where sterile interventional procedures are occurring;
- food preparation and food storage areas;
- medication preparation or storage areas;
- clean or sterile supply storage areas; and / or
- rooms in which transmission based precautions are in place (isolated rooms).

In cases where the service animal is excluded by law or on the basis of medical or safety considerations, Mackenzie Health will make reasonable efforts to accommodate the customer.

This accommodation may be determined jointly with the customer and may involve:

i) placing the animal in a secure place, where permitted by law, while the customer accesses hospital goods and services;
ii) offering reasonable assistance to the customer so that they may access the hospital’s goods and services without the need for their service animal.

PROCEDURES FOR THE USE OF SUPPORT PERSONS

4.0 Introduction

Customers with disabilities may require the assistance of a support person to help them obtain, use and/or participate in the goods and services provided by or on behalf of Mackenzie Health. Customers with disabilities are permitted to enter premises the hospital owns or operates with their support person and to have access to that person while on property owned or operated by Mackenzie Health.

4.1 Identifying Support Persons

Support persons provide assistance to a person with a disability and may be a family member, friend, or a paid professional. Support persons do not require specialized training or certification and the type of support they provide will depend on the customer’s unique needs.
4.2 Hospital Responsibilities

Mackenzie Health will ensure that staff, physicians, volunteers and others providing services on behalf of the hospital:

i) permit customers and patients with disabilities to enter hospital premises with their support person;
ii) permit customer with disabilities to have access to their support person while on hospital premises;
iii) understand that the focus of customer service and communication is the customer and not their support person;

Support persons are not restricted to visiting hours and wherever possible are allowed unlimited access to the disabled patient. In the event of inpatient needs, sleeping arrangements will be provided to the support person in the same vicinity at no extra cost.

4.3 Support Person Responsibilities

The support person will be responsible for the cost of his or her own meals. If any additional service fees are required for a support person, notice will be provided in advance.

4.4 Dealing with Confidential Matters in the Presence of a Support Person

Where a support person is accompanying a person with a disability in situations that may involve the discussion/release of confidential information (such as Personal Health Information), informed consent must be obtained. This consent must be documented in the joint progress notes of the health record. If a different support person is used for subsequent care and services, a new consent should be obtained and documented.

4.5 Restricting Access to Support Persons

A person with a disability who is accompanied by a support person, may be prevented from having access to his/her support person in controlled access areas, including but not limited to surgical suites, procedure rooms, Post Anaesthetic Care Unit (PACU) and recovery rooms.

The hospital may limit a support person’s access to their charge on the basis of medical or safety considerations. For example, if a designated support person has a communicable illness and it is likely that they will put others at risk due to their illness, they may be denied access to their charge or to certain areas of the hospital.

If possible, situations requiring the separation of the person with a disability and their support person will be discussed with the individual in advance and appropriate measures taken. If a person with a disability is deprived of access to their support person for any reason, the hospital will assume the responsibility of providing equivalent support, as identified by the disabled person.
Special consideration may be given when the disabled patient identifies the need for their support person to be present in controlled access areas on a case by case basis given consideration to the physical, emotional and psychological well-being of the patient, until the induction of anesthesia. When required, the support person will be provided with the necessary instructions, attire and supervision to maintain the integrity of the surgical or procedural area. Following anesthesia the support person will be provided access to the PACU or recovery area.

If the support person is permitted access to a controlled access care area (surgical suites, procedure rooms, PACU and recovery areas) where exposure to confidential information of other patients may occur, staff is to be alerted to ensure such exposure is minimized. Prior to entering the controlled access area, the support person must sign a Confidentiality Agreement and adhere to privacy laws.

4.6 Mandating a Support Person

The hospital may also require the presence of a support person, if it is deemed by staff that a significant amount of health and safety risk will be incurred by an individual with a disability attempting to access hospital services without assistance.

PROCEDURES FOR PROVIDING NOTICE OF TEMPORARY DISRUPTIONS

5.0 Introduction

Mackenzie Health strives to operate its services and facilities without interruption. However, at times disruptions in services and facilities will occur. Should a temporary disruption in these services or facilities occur, in whole or in part, the organization will make reasonable efforts to provide notice of these disruptions. Temporary disruptions may occur in elevators, automatic door openers, ramps or to services such as sign language interpretation, among others.

5.1 Providing Notice of Temporary Disruptions in Services and Facilities

Disruptions in certain services and facilities may interfere with the ability of customers and other third parties to access hospital services. Temporary disruptions in facilities include, but are not limited to, unscheduled or scheduled maintenance, repairs, and construction. Temporary disruptions in services may also include the unexpected cancellation of services. When a temporary disruption occurs in the services or facilities used by persons with disabilities to access hospital services, whether planned or unplanned, Mackenzie Health will provide notice of these disruptions to the public. The amount of advanced notice the hospital receives about temporary disruptions varies, therefore, the amount of advanced notice given to the public may also vary.

a. Content of Notices

Notices will provide the following information:
i) the reason for the temporary disruption, such as repairs, maintenance, construction, inclement weather, unexpected circumstances, etc.;
ii) the expected length of the temporary disruption; and.
iii) alternate means of accessing the goods or services, if available. For example, an alternative accessible route or entrance or the option of using fax or email if a TTY is not operating.

b. Format and Placement of Notices
Notices will be posted in a manner that is reasonable under the circumstances with consideration given to the disability(s) of customers who access the disrupted service or facility.

i) Notices may be provided in print by signage; or electronically by website postings; or by telephone recordings; or in certain situations notice may be provided directly to specified customers, or by other reasonable methods.
ii) Visual notices will be provided in large clear print, using contrasting colours between text and background;
iii) Notices may be placed at entrances, structures and/or departments where temporary disruption occurs;
iv) Notices may be posted at the site of the temporary service or facility disruption;
v) Notices will be posted in obvious places. Reasonable efforts will be taken to ensure an unobstructed view of the notice;
vi) Staff should be cognizant of placing notices where they are visible to persons who may be using assistive devices, such as wheelchairs; and,
vii) Staff should be mindful of maintaining the secure placement and visibility of notices. For example, inclement weather may affect the visibility of notices.

c. Departmental Responsibilities for Temporary Disruptions
Upon becoming aware of a disruption in a service or facility regularly used by persons with disabilities, staff will notify the department responsible for the service or facility so they may follow the notification procedures. Department managers and/or supervisory staff will:

i) Determine the expected length of the temporary disruption
ii) Determine the most appropriate and reasonable format(s) of providing notice, giving consideration to the potential disabilities of customers who use the facility or service, and the length of the disruption;
iii) Determine the most appropriate location(s) for the notice;
iv) Contact Switchboard at ext. 2310 and any other relevant parties to have the notices posted
vi) Review alternative means of accessing the affected services;
vii) Determine if an existing alternative is reasonable under the circumstances, giving consideration to: the appropriateness of the alternative, the cost, the effect(s) on the customer and others, the ability of the customer and others to access the service, the availability of the alternative, and associated health and safety considerations; and,
viii) Provide information about the reason for the disruption and reasonable alternatives for customers with disabilities.
5.2 Providing Assistance to Customers during Temporary Disruptions

Patients and customers with disabilities may need assistance accessing Mackenzie Health goods and services during a temporary disruption. In such circumstances, the following should occur:

i) Customers requiring assistance should make themselves known to hospital staff, physicians and/or volunteers;
ii) Staff, physicians and volunteers should provide reasonable assistance to customers with primary consideration being given to the health and safety of all involved.

PROCEDURES FOR RECEIVING FEEDBACK

6.0 Introduction

Mackenzie Health is committed to providing quality care and services that are accessible to all persons that the hospital serves. Feedback about Mackenzie Health care and services and the manner in which they are provided to customers with disabilities are welcomed as they may identify areas that require change and encourage continuous service improvements. Mackenzie Health would also like to know when customers and patients are pleased with the manner in which goods and services are provided. The following processes apply to services provided by or on behalf of the hospital.

6.1 Avoiding Conflicts and Misunderstandings

To avoid conflicts and misunderstandings about hospital services and the manner in which they are provided, patients are encouraged to review and discuss with appropriate staff, the hospital’s Accessible Customer Service Policy and the Accessible Customer Service Procedures.

6.2 Feedback Process

a. How to Provide Feedback to Mackenzie Health regarding the Accessibility of Goods and Services

The ultimate goal of Mackenzie Health is to meet and surpass expectations including when serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way Mackenzie Health provides health care services to people with disabilities can be made by:
- using Patient Feedback Forms,
- via Email and Mackenzie Health Website
- via phone call to Patient Relations Department
- by any other appropriate method
b. Who can Provide Feedback or Complaints?
Feedback or complaints may be provided by customers or from a friend, relative, legal guardian or support person of a customer with a disability.

c. When Should a Complaint be Made?
Complaints should be brought to the attention of the Patient Relations Department as soon as possible. A delay in making a complaint may affect the ability of the organization to adequately investigate the complaint and to arrive at a satisfactory resolution.

d. Communication of the Feedback and Complaint Process
Mackenzie Health will communicate the principles of the feedback procedure/process by making information available:

i) through regular contact methods used by customers and patients (i.e. general inquiries to staff);
ii) on the Mackenzie Health Accessibility website (http://www.mackenziehealth.ca); and,
iii) in multiple accessible formats, upon request.

e. How Mackenzie Health will Deal with Feedback
Complaints will be addressed according to Mackenzie Health’s Patient Concerns Resolution Process (Appendix B).

6.3 Accessible Formats

Customers with disabilities who file a complaint shall receive information pertaining to the complaint process in a format that takes their disability into consideration.

REFERENCES


Appendix A:

Assisting patients and visitors who are deaf or hard of hearing

Deaf or hard of hearing disabilities reduce a person’s ability to hear clearly. They can restrict the ability to read lips, locate signs or use tactile cues.

Tips on assisting these patients and visitors:

- Don’t assume the individual cannot see you.
- If you offer assistance, wait until you receive permission.
- Offer your arm (the elbow) to guide the person and walk slowly.
- If you are accompanying a person, let them know you are approaching a door, an area or a location.
- Don’t leave the person in the middle of a group, direct the person to a chair or a comfortable location.
- Identify immediately other details to identify the person to the environment around them.
- Say goodbye before walking away.

Assisting Patients and Visitors with Vision Disabilities

Vision disabilities reduce a person’s ability to see clearly. They can restrict the ability to read lips, locate signs or use tactile cues.

Tips on assisting these patients and visitors:

- A service animal is a working animal.
- Get a written note from the animal’s owner describing the animal’s duties and responsibilities.
- A trained service dog is considered a hearing or seeing animal.
- To assist the animal, not the medical condition.
- The owner is responsible for the care and supervision of their animal.
- Do not feed the animal. You may provide water for the service animal, if the owner requests it.