

Policy Title: Accessibility and Customer Service for People with Disabilities	Policy #: VIII-105
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PURPOSE

Providence Healthcare is committed to providing compassionate and accessible service to all. Under the *Accessibility for Ontarians with Disabilities Act, 2005* all health care facilities must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility standards for customer service for Providence, in accordance with Ontario Regulation 429/07.

PROCEDURE

Goods and services will be provided in a manner that respects the dignity and independence of all persons. The provision of goods and services to persons with disabilities will be integrated wherever possible. Persons with disabilities will be given an opportunity equal to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of Providence Healthcare.

This policy applies to all employees, physicians, volunteers, students and contracted staff at Providence Healthcare.

The policy applies to all activities that take place at Providence Healthcare, as well as Providence-related activities that occur elsewhere, such as training, support programs, fundraising events and social functions, and activities involving access to Providence's computer and communications systems.

Use of Service Animals

If a person with a disability is accompanied by a guide dog or other service animal, Providence will ensure that the person is permitted to enter any facility with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, Providence will ensure that other measures are available to enable the person with a disability to obtain, use and benefit from Providence's goods and services.

Use of Support Persons

If a person with a disability is accompanied by a support person, Providence will ensure that both persons are permitted to enter any facility, and that the person with a disability is not prevented from having access to the support person. Providence may require a person with a disability to be accompanied by a support person when at Providence, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others in the facility. A support person may accompany participants who use the facilities or programs free of charge.

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Access to Goods and Services

All goods and services provided by Providence to people with disabilities will be integrated unless an alternate measure is necessary, to enable a person with a disability to obtain, or benefit from the goods or services.

People with disabilities will be given equal opportunity to obtain, use and benefit from the services or goods provided by Providence.

People with disabilities have the right to use their own personal assistive devices while accessing the goods or services provided by Providence, unless there is a defined risk associated with that use. When a person makes a request to use their own personal assistive device, the appropriate staff member will assess safety compliance. If the device appears to be unsafe, the hospital will endeavour to find an appropriate substitute device.

Providence staff will have knowledge of the assistive devices available at Providence and have access to staff members with knowledge of appropriate use of the device (such as a Pocket Talker Hearing device).

Notice of Temporary Disruptions

Providence will provide notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. A description of alternative facilities or services will be provided, if available. Providence will provide notice of temporary disruptions in a number of ways:

1. *At the site of the disruption:* In the event a disruption is to a physical space/area at Providence (indoor and outdoor), a notice will be posted at the site of the disruption.
2. *Web site:* Depending on the severity of the disruption, information if the disruption will appear on the Providence website within the 'alert' scrolling message, on the home page or on the 'Accessibility' page under 'General Information'.
3. *Hotline:* For significant disruptions to access, information will be recorded on the Providence hotline at 416-285-3755.

For details, refer to the document *Standard Work for Giving Notice of Disruptions* on the Providence Healthcare intranet under 'Accessibility.'

Accessibility Training

Every person who deals with members of the public or who participates in developing Providence's policies, practices and procedures governing the provision of goods and services to the public; including organization staff, volunteers, agents, contractors and others who provide service on behalf of Providence will receive training regarding the provision of goods and services to persons with disabilities.

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The training will include the following information:

1. the purposes of the Accessibility for Ontarians with Disabilities Act,
2. how to interact and communicate with persons with various types of disabilities,
3. how to interact with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person
4. how to use equipment made available by Providence to help people with disabilities to access goods and services
5. what to do if a person with a disability is having difficulty accessing Providence's goods and services

Training will be provided to each person according to his or her needs and duties and as soon as is practicable after he or she is assigned the applicable duties.

Training will be provided on an ongoing basis in connection with changes to policies, practices and procedures governing the provision of goods or services to persons with disabilities.

A record of the dates on which training is provided and the number and name of individuals to whom it is provided will be kept by Human Resources.

The training will be delivered as follow:

- current employees, physicians and volunteers will received the *Customer Service Standards* booklet (the *Staff Guide to Disability and Interacting with People with Disabilities*)
- all new employees, volunteers and students will receive the *Customer Service Standards* booklet at their respective orientations.
- additional e-learning training will be available through LMS when applicable, according to his or her needs and duties and as soon as is practicable after he or she is assigned the applicable duties.
- all third-party contractors will receive the *Customer Service Standards* brochure (the *At-A-Glance Guide to Interactive with People with Disabilities*) prior to working at Providence

The training will be recorded as follows.

- lists for all employees, physicians and volunteers who received the initial distribution of the *Customer Service Standards* booklet (December 2009) will be recorded through Learning and Development
- ongoing e-learning will be recorded through LMS
- attendance at orientation will be recorded through Learning and Development
- volunteer training will be recorded through Volunteer Services
- individual managers will record attendance at training offered through staff meetings.
- physicians will receive training through the Medical Advisory Committee and will be recorded through medical affairs.

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Feedback process

Providence has a feedback process through which people with disabilities are encouraged to provide information and feedback about the goods and services they receive. Feedback can be received in a variety of ways, in person, by mail, or email, by telephone, fax or otherwise. Please refer to the document *Process for Providing Feedback* on the intranet under General Information>Accessibility for full details.

Providence's feedback process is promoted on the website under General Information>Accessibility and through other printed outreach methods, such as the *Accessibility at Providence Healthcare* brochure. The document outlining the feedback process is available on the intranet under General Information>Accessibility.

Accessible Formats and Communication Supports

Providence will provide documents and communication supports, or information contained therein, in a format that meets any member of the public's needs (as agreed upon with the person).

Notice of availability of documents

Providence will provide the public notice of the availability of the documents, as required by the Accessibility Standards for Customer Service, on request. Notice of availability will be provided on the Providence web site, through ads on digital display monitors throughout Providence, and through the *Accessibility at Providence Healthcare* brochure.

Related Policies:

<i>Policy Name</i>	<i>Policy #</i>	<i>Volume</i>	<i>Developed by:</i>
Outdoor Mobility Safety	Policy #15-23	Clinical Profession-Specific – OT	Occupational Therapy Programs
Mobility Device – Permanent Prescription	Policy #13-30	Clinical Interprofessional Manual	Programs
Pets, Service and Residential Animals	Policy #16-17	Clinical Interprofessional Manual	Programs

DEFINITIONS:

Person With Disability - disability means:

- a) 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,

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- b) A condition of mental impairment or a developmental disability.
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- d) A mental disorder, or
- e) 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.

Example: A person with arthritis has a disability that over time may increase in severity.

Example: A person with a brain injury has a disability that is not visible.

Example: A person with multiple sclerosis has a disability that causes her to experience periods when the condition does not have an effect on her daily routine and other periods when it does.

It is important to understand that information about a disability is personal and private and must be treated confidentially.

Assistive Devices - Devices used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by this standard. Assistive devices include, but are not limited to, wheelchairs, reading machines, recording machines, hearing devices and devices for grasping; (AODA, 2005)

Service Animal - An animal for a person with a disability, if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

The customer service standard's provisions include animals used by people with autism, mental health disabilities, those with physical or dexterity disabilities as well as others.

Guide Dog - A guide dog is a dog trained for a blind person and having the qualifications prescribed by the regulations (R.S.O. 1990, c. B.7, s. 1 (1). Blind Persons Rights Act). A guide dog has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act to act as a guide dog for people who are blind.

Support Persons - A support person is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, 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. (AODA January 2008)