

University Health Network Policy & Procedure Manual Administrative – Accessibility for Ontarians with Disabilities Act – Integrated Accessibility Standards Regulation

Policy

University Health Network (UHN) is committed to providing a respectful, welcoming, accessible, and inclusive environment in the provision of goods and services for employees, patients, students, visitors and volunteers.

As a designated public sector organization, UHN is obligated, under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, S.O. 2005, c. 11, to meet the accessibility needs of people with disabilities.

UHN is committed to, and strives to ensure that, the AODA, the standards and all other relevant legislation concerning accessibility are rigorously observed. UHN ensures that all persons within its community are aware of their rights and responsibilities to promote an accessible and inclusive environment with and for persons who have disabilities.

UHN's services, programs, goods, and facilities are to be available to people with disabilities in a manner that:

- is free from discrimination;
- is inclusive;
- provides [accessible formats](#) and [communication supports](#);
- seeks to provide integrated services, and
- takes into consideration a person's [disability](#).

This policy is intended to provide the overarching framework to guide the review and development of other UHN policies, standards, procedures and guidelines to comply with the standards developed under the AODA.

Application

This policy applies to all UHN employees, patients, students, visitors and volunteers, and to any individual who provides goods, services or facilities to the public or other third parties on behalf of UHN in accordance with the legislation.

Accessibility Planning Committee

UHN has established the Accessibility Planning Committee (the Committee) which is constituted by a broad representation of stakeholders. The Committee advises the UHN

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senior executive about the requirements and implementation of AODA accessibility standards, preparation of accessibility reports, and other matters for which UHN may seek advice.

Accessibility Plans & Policies

The Committee will produce a [Multi-year Accessibility Plan](#). The Plan will be posted on UHN's website and will be made available in an [accessible format](#) and with [communication supports](#), upon request. Progress on the Plan will be provided annually in UHN's update report to the Senior Management Team. The Accessibility Plan will be reviewed and, if necessary, updated at least once every five years.

UHN maintains policies governing how it will meet its requirements under the AODA, and will provide policies in an [accessible format](#), upon request.

Accessible Formats & Communication Supports

Except as otherwise provided by the AODA, UHN, upon request, and in consultation with the person making the request, will provide or make arrangements to provide [accessible formats](#) and [communication supports](#) for persons with disabilities. Accessible formats and communication supports will be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons, in accordance with the [Accessible Formats and Communication Supports Procedure](#).

This does not apply to products and product labels, [unconvertible](#) information or communications and information that UHN does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the department will provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible and a summary of the unconvertible information or communications.

Procurement of Goods, Services, Facilities & Kiosks

When procuring goods, services, self-service kiosks or facilities, UHN will incorporate accessibility criteria and features, unless it is not practicable. If not practicable, UHN will provide an explanation, upon request.

Training

All UHN employees, volunteers and third parties providing goods and services to members of the public on UHN's behalf, as well as those who develop the policies, practices and procedures governing the provision of goods or services to members of the public or other third parties will receive accessibility training, which includes:

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- A review of the purposes of the AODA and the requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and instruction about the following matters:
 - a. how to interact and communicate with persons with various types of disabilities;
 - b. how to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other [service animal](#) or the assistance of a [support person](#);
 - c. how to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a [disability](#), and
 - d. what to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

- A review of the requirements of the accessibility standards referred to in the AODA Integrated Accessibility Standards (Ontario Regulation 191/11) and on the Human Rights Code as it pertains to persons with disabilities.

The training provided will be appropriate to the duties of the employee, volunteer or third party. Training will take place as soon as is practicable and, upon completion, UHN will keep a record of the training provided including the dates when the training took place.

Feedback

Feedback on how services are delivered to people with disabilities will be collected, forwarded to the appropriate UHN representative for response, documented and tracked. Feedback will be collected by phone, teletypewriter, e-mail to <mailto:accessibility@uhn.ca>, in person at any of UHN's information service desk locations, and Patient Relations. Feedback will be accepted in [accessible formats](#) and with other [communication supports](#), as required.

Documentation

Documentation that describes this policy and each of its requirements will be maintained on [UHN's website](#) and provided to individuals, upon request, in the appropriate format or communication support.

Customer Service Standards

Assistive Devices

UHN employees, volunteers and third-party contractors will accommodate the use of personal assistive devices including, but not limited to, wheelchairs, canes, walkers, scooters and Braille display boards. Assistive devices including, but not limited to, assistive listening devices that are available for access to specific services and

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programs will be kept in good working order, and the public will be informed of their availability.

Service Animals

UHN employees volunteers and third-party contractors will accommodate the use of [service animals](#) by people with disabilities who are accessing UHN's services or goods unless the animal is otherwise excluded by law and prohibited from entering areas due to infection control according to the Health Protection and Promotion Act, R.S.O. 1990, c. H.7.

Support Persons

Where a person with a [disability](#) accessing UHN's goods or services is accompanied by a [support person](#), UHN employees, volunteers and third-party contractors will ensure that both persons are permitted to enter the premises together and will ensure that the person with a disability can access the support person while on the premises.

Admission Fees

If UHN charges an admission fee in connection with a support person's presence at an event or function, UHN will ensure that notice is given in advance about the amount, if any, that is payable in respect of the [support person](#) accompanying a person with a [disability](#).

Notice of Service Disruption

In the event that there is a temporary service disruption in the availability of facilities, services or goods used by persons with disabilities (e.g., temporary loss of elevator service), UHN will give notice to the public of the reason for the disruption, the dates of disruption, its anticipated duration and a description of alternative facilities or services, if available. The notice may vary, depending on the circumstances, and may include postings in conspicuous places at the affected premises, other UHN facilities, and on [UHN's website](#), as well as by other means that will ensure that the notice reaches those persons potentially affected by the temporary disruption.

For details on customer services provided to people with disabilities, refer to the [Accessibility for People with Disabilities – Customer Services](#) policy 1.20.011.

Information & Communication Support Standards

Communication

When communicating with a person with a [disability](#), UHN employees, volunteers and third party contractors will do so in a manner that takes into account the person's disability. Guidelines for communicating with people who have various types of

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disabilities are provided in UHN's [Accessible Formats and Communication Supports Procedure](#).

Terminology

When referring to people with disabilities, UHN employees, volunteers and third-party contractors will use terminology that adheres to guidelines provided in UHN's Accessibility Training for Customer Service (2009).

Accessible Websites & Web Content

Internet websites and web content controlled directly by UHN 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 AODA Integrated Accessibility Standards.

Emergency Procedures, Plans & Information

UHN will provide all existing public emergency procedures, plans and public safety information, upon request, in an [accessible format](#) or with appropriate [communication supports](#) in a timely manner.

Employment Standards

Recruitment

UHN will post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing will be notified that accommodations for material to be used in the process are available, upon request. UHN will consult with any applicant who requests an accommodation in a manner that takes into account the applicant's [disability](#). Successful applicants will be notified about UHN's policies for accommodating employees with disabilities as part of their offer of employment.

Employee Supports

UHN will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to [disability](#). UHN will provide this information to new employees at orientation or as soon as practicable after they begin their employment and provide updated information to all 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.

For details on employment accommodation for people with disabilities, refer to the [Accommodation in Employment for Persons with Disabilities](#) policy 2.10.012.

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Accessible Formats & Communication Supports for Employee

Upon an employee's request, UHN will consult with the employee to provide or arrange for the provision of [accessible formats](#) and [communication supports](#) for information that is needed in order to perform the employee's job, and information that is generally available to employees in the workplace.

UHN will consult with the employee making the request in determining the suitability of an [accessible format](#) or [communication support](#).

Workplace Emergency Response Information

If an employee's [disability](#) is such that workplace emergency response information is necessary and UHN is aware of the need for accommodation, this information will be provided to employees. In addition, this information will be provided, with the employee's consent, to the person designated to provide assistance. The information will undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed, and when UHN reviews its general emergency response plan. (Refer to the [Individualized Workplace Emergency Response Planning for Employees with Disabilities](#) policy 6.30.009 and the [UHN Emergency Codes](#).)

Documented Individual Accommodation Plans

A written process for the development and maintenance of documented individual accommodation plans will be developed for employees with disabilities. If requested, these plans will include information regarding [accessible formats](#) and [communication supports](#). If requested, the plans will include individualized workplace emergency response information.

Return to Work Process

UHN will have in place a documented return to work process for employees returning to work due to [disability](#) and requiring disability-related accommodations. This return-to-work process will outline the steps that UHN will take to facilitate the return to work.

Performance Management, Career Development & Redeployment

UHN will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management, and when considering redeployment.

Transportation Standards

The UHN Shuttle Service provides no-charge transportation between Toronto General Hospital, Toronto Western Hospital and Princess Margaret Cancer Centre. UHN's Shuttle Service is a specialized service committed to meeting the spirit and intent of the

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AODA. Where required and upon request, UHN will provide equivalent accessible transportation services.

The UHN Library and Patient Education Centres provide services to the public and, upon request, will provide equivalent accessible transportation services.

Built Environment Standards (Design of Public Spaces)

UHN will comply with the AODA Design of Public Spaces Standards (Accessibility Standards for The Built Environment) when undertaking new construction and redevelopment of public spaces in the following areas:

- recreational trails and beach access routes;
- outdoor public use eating areas;
- outdoor play spaces;
- exterior paths of travel;
- accessible parking;
- obtaining services, and
- maintenance of accessible elements.

This policy does not apply to municipal construction that is external to UHN for which UHN has provided a permit; however, compliance with the AODA Built Environment Standards is encouraged.

UHN will ensure that the Accessibility Design Standards reflect the AODA Built Environment Standards.

Responsibilities

The UHN Accessibility Planning Committee and Diversity and Mediation Services Office is responsible for reviewing this policy annually and recommending amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.

UHN Accessibility Planning Committee

- Provide advice and direction on the implementation of this policy.

Supervisors & Managers

- Ensure that they and their staff are familiar with and comply with this policy.
- Monitor current practices to ensure compliance.

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Monitoring & Contraventions

The failure to comply with the AODA regulations can result in administrative penalties.

Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

Requests for further information on this policy may be sent to accessibility@uhn.ca.

Definitions

Accessible formats – May include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

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.

Disability – Disability (or handicap) refers to all disabilities protected in the Human Rights Code, R.S.O. 1990, Ch.H.19 as defined in sec.10 of the Code as follows:

- “(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, including diabetes mellitus, epilepsy, and degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental retardation or impairment,
- (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 Workplace Safety and Insurance Act.”

Service animal – Defined under Section 4(9) of the Accessibility Standards for Customer Service, O. Reg. 429/07, as follows:

- “an animal is 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.”

Support person – Defined under Section 4(8) Accessibility Standards for Customer Service, O. Reg. 429/07, as follows:

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“a support person means, in relation to a person with a [disability](#), another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.”

Unconvertible – Not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available.

References

1. [Health Protection and Promotion Act R.S.O. 1990, Chapter H.7.](#)
2. [Human Rights Code R.S.O. 1990, Chapter H.19.](#)
3. Ontario Ministry of Economic Development, Trade and Employment. (2008). [Accessibility Standards.](#)
4. [Ontario regulation 191/11 Integrated Accessibility Standards.](#)
5. [Ontario Regulation 429/07 Accessibility Standards for Customer Service.](#)
6. University Health Network Accessibility Committee (2012). [Multi Year Accessibility Plan 2012-2021.](#)
7. University Health Network Accessibility Committee. (2012). [2012-2014 Accessibility plan.](#)
8. University Health Network. (2009). *Accessibility training for customer service.*

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