

<b><u>Title:</u></b>	<b>Accessibility</b>		
<b><u>Manual:</u></b>	Corporate		
<b><u>Section:</u></b>	Human Resources		
<b><u>Approval Body:</u></b>	SLT Final – Vice President, People Services and CHRO		
<b><u>Original Effective Date:</u></b> <i>(mm/yyyy)</i>	March 2010	<b><u>Reviewed Date:</u></b> <i>(mm/yyyy)</i>	August 2023
<b><u>Revised Date:</u></b> <i>(month/yyyy)</i>	November 2023	<b><u>Next Revision Date:</u></b> <i>(month/yyyy)</i>	November 2025
<b><u>Cross References:</u></b>	Patient Relations-Patients Concerns Resolution Process Interpretation and Translation Policy Pet Visitation and Animal Therapy Inclusion, Diversity and Equity Policy Preplacement Health Assessment Mandatory Corporate Training for All Staff Policy		
<b><u>Key Words:</u></b>	<i>accessibility, disability, guide dog, service dog, service animal, assistive devices, support person, accommodation, barrier free, barrier, communication, service animals, transportation</i>		
<b><u>Developed by:</u></b> <i>(Title)</i>	<b>Director, Human Resources Services</b>	<b><u>Owner:</u></b> <i>(Title)</i>	<b>Vice President, People Services &amp; CHRO</b>

## **POLICY:**

Mackenzie Health is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We 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.

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

Mackenzie Health 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.

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

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

## Training

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

In addition, we will train:

- all persons who participate in developing the organization's policies; and
- other persons, including third-party partners, 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:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- 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.
- 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 completed, including the dates on which the training was completed and by whom.

## Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

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.

We ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

### **Information and Communication**

We communicate with people with disabilities in ways that take into account their disability. We will work with the person with disabilities to determine what method of communication works for them.

When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- in a timely manner, taking into account the person's accessibility needs due to disability; and
- at a cost that is no more than the regular cost charged to other persons

We 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:

- an explanation as to why the information or communications are unconvertible; and
- a summary of the unconvertible information or communications

We notify the public about the availability of accessible formats and communication supports on our website.

We continually strive to meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

We are committed to providing fully accessible telephone service. We will provide training to staff, physicians, volunteers, students and contractors to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

We will offer to communicate by email if telephone communication is not suitable to an individual's communication needs or is not available.

TTY sets are available upon request to be installed in a patient's room.

### **Service Animals**

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When we cannot easily identify that an animal is a service animal, our staff 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 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.

A regulated health professional is defined as a member of 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

When a person requires a service animal, every effort will be made to accommodate and ensure that the surroundings will allow the person to effectively maintain their relationship with the animal. If this is not possible due to health, safety or infection control concerns, a mutually agreed upon location for the animal may be identified for a limited time. In such instances, other provisions will be made to ensure that the individual receives the support otherwise provided by the service animal.

If service animals are prohibited or cannot be accommodated as a result of health or safety concerns, the Hospital will explain why the animal is excluded or discuss with the individual alternatives for accessing the service.

### **Support Persons**

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises, unless it poses a health, safety or infection control risk. In this instance, other provisions will be made to ensure that the individual receives the assistance otherwise provided by the support person. In some cases, it may be necessary to seek the consent of the person with the disability prior to discussing confidential information in front of the support person.

In certain cases, Mackenzie Health might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability or others on the premises. Before making a decision, Mackenzie Health will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- 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

Mackenzie Health is aware that the operation of its services and facilities is important to the public. However, temporary disruptions at its facilities and services may occur due to reasons that may or may not be within its control or knowledge.

It is recognized that these disruptions could impede the ability of individuals with disabilities to access Mackenzie Health and its services. Therefore, Mackenzie Health will make a reasonable effort to provide advance notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that may be available. Depending on the nature of the disruption and who is impacted, Mackenzie Health may communicate using any of our external communications channels, including our website, social media, signage, digital screens, etc.

In the event of an unexpected disruption, advance notice will not be possible. In such cases, Mackenzie Health will provide notice as soon as possible.

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Mackenzie Health will notify customers promptly. Information provided would include where possible, information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services.

## Feedback Process

Mackenzie Health welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns. We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

Feedback may be provided in the following ways:

- Using Patient Feedback Forms
  - Available here: <https://www.mackenziehealth.ca/patients-visitors/patient-relations>
- Via the Patient Relations department:
  - Office Locations:
    - Mackenzie Richmond Hill Hospital – Level 2, B-Wing, Room 2906
    - Cortellucci Vaughan Hospital – Level 1, Room 1.020
  - Telephone:
    - Local from Richmond Hill: 905-883-1212, ext. 7494
    - Local from Vaughan: 905-417-2000, ext. 7494
  - Email: [patientrelations@mackenziehealth.ca](mailto:patientrelations@mackenziehealth.ca)

All feedback, including complaints received through the Patient Relations office dealing with the accessibility of Mackenzie Health services, will be addressed through action and will be collected and provided to the department accountable for setting the annual accessibility plan for review and inclusion as part of that process.

Mackenzie Health staff, learners, volunteers and contractors can share feedback on any concerns related to accessibility with their leaders and also with the Human Resources team as it relates to the employee accommodation process.

Individuals who provide feedback on accessibility can expect to hear back as soon as practicable.

Mackenzie Health will ensure the feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

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

Mackenzie Health notifies the public that documents related to accessible customer service, are available upon request by posting a notice on our website.

Mackenzie Health will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

### **Self-Service Kiosks**

Mackenzie Health will incorporate accessibility 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, we will provide an explanation upon request.

### **Procurement**

Mackenzie Health is committed, where possible, to include accessible design, criteria and features when purchasing new goods, services or facilities for our organization so that they are accessible to people with disabilities. If it is not possible and practical to do so, we will provide an explanation upon request.

### **Employment**

Mackenzie Health notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. When job applicants are individually selected to participate in an assessment or selection process, they are notified that accommodations are available upon request. The Human Resources team will consult with the applicants and provide or arrange for suitable accommodation.

Mackenzie Health will notify successful applicants of policies for accommodating employees with disabilities when making offers of employment. We ensure that work is safe and suitable for staff and that any required accommodations can be supported prior to the individual's start date. Mackenzie Health provides updated information to employees 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.

When arranging for the provision of suitable accommodation, employees are consulted in a manner that takes into account the accessibility needs due to disability.

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency. This information will be provided as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

Individual accommodation plans for employees are developed according to a documented process. For persons with disabilities, such plans are developed and documented in consultation with the employee's manager, the Occupational Health & Wellness and/or Human Resources department. Accommodation plans outline the accommodation that is to be provided, including information regarding accessible formats and communications supports, as well as individualized workplace emergency response information, if applicable.

Employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work will follow a documented process to do so.

The Mackenzie Health performance management, career development and redeployment processes take into account the accessibility needs of all employees.

### **Design of Public Spaces**

We will meet accessibility laws when building or making major changes to public spaces. We put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

### **Changes to Existing Policies**

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.

### **REFERENCES:**

[Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#)

[Ontarians with Disabilities Act, 2001, S.O. 2001](#)

[Ontario Human Rights Code](#)

[Blind Persons' Rights Act, R.S.O. 1990, c. B.7](#)