



<b>POLICY No:</b>	I-d-65-73
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<b>EFFECTIVE DATE:</b>	
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<b>TITLE:</b>	Providing Access for People with Disabilities
<b>ISSUED BY:</b>	Accessibility for Ontarians with Disabilities Planning Committee
<b>APPROVED BY:</b>	Sinai Health Senior Leadership
<b>KEYWORDS:</b>	Accessibility Accommodation Assistive devices Barrier free access Customer Service Standard Deaf Disabilities Discrimination Diversity Duty to Accommodate Employment Guide dog Hearing Impaired Human rights Independence Personal assistive devices Procurement Service animals Service dogs Sign language-ASL Support person TTY Wheelchair
<b>STAKEHOLDERS:</b>	This policy applies to members of the Hospital Community at Sinai Health, which includes all employees, health care professionals, students, researchers, interns, volunteers, patients, families, visitors, advisory groups, public, community-based partners, affiliated research institutes and associations, suppliers, contractors, and other health care and business partners with Sinai Health all hospital employees, volunteers, contractors and any other people who interact with the public on behalf of Sinai Health.

## PURPOSE AND SCOPE

Principles, Purpose and Application

### Principles

Sinai Health is committed to fostering a healthy and positive environment, which recognizes and respects the personal worth, dignity and diversity of each member of the Hospital Community.

### Purpose

This comprehensive policy has been prepared to ensure that all members of the Hospital Community are aware of their rights and responsibilities to benefit all patients, visitors, employees, associates and volunteers by achieving accessibility for people with disabilities. This will be done by developing, implementing and enforcing accessibility standards concerning goods, services, accommodation, facilities, buildings and employment.

Consistent with the aims and objectives of the Accessibility for Ontarians Disability Act, the

	<b>POLICY No:</b>	I-d-65-73
<b>TITLE:</b>	Providing Access for People with Disabilities	

Canadian Charter of

Rights and Freedoms, the Ontario Human Rights Code, and consistent with its mission and values, Sinai Health will strive to provide an accessible physical and social environment for people with disabilities.

The policy is designed to bring about systemic and organizational change that will meet our objectives under the Accessibility for Ontarians with Disabilities Act and the Ontario Human Rights Code. This policy is also designed to foster the conditions that create a healthy, respectful and positive hospital and work environment. Specifically, this policy is designed to accomplish the following outcomes:

- Foster a positive hospital environment through proactive measures, barrier free systems analysis and enforcement;
- Ensure that all members of the hospital community are treated equitably and with dignity and respect;
- Address breaches of this policy and settle disputes quickly, fairly and as close to the source as possible;
- Ensure that all members of the hospital community are aware of their rights and responsibilities under this policy
- Provide proactive education, organizational training and development at the Hospital is aimed at providing an environment that is accessible.

### **Application**

This policy applies to members of the Hospital Community at Sinai Health, which includes all employees, health care professionals, students, researchers, interns, volunteers, patients, families, visitors, advisory groups, public, community-based partners, affiliated research institutes and associations, suppliers, contractors, and other health care and business partners with Sinai Health.

This policy applies to all activities which take place at the Hospital, as well as to Hospital-related activities which occur elsewhere, including but not limited to business undertakings, teaching or training programs, research initiatives, community projects, partnership activities, social functions, fundraising events, and activities involving access to the Hospital's computer or communications systems.

All contractual relationships between the Hospital and its business, research, and community partners are governed by this policy. All such contracts and agreements will include a provision requiring compliance with this policy.

### **POLICY STATEMENT**

1. People with disabilities will be given equal opportunity to obtain, use and benefit from

## TITLE:

Providing Access for People with Disabilities

the services, goods, facilities and/or employment provided by Sinai Health.

2. All goods and services provided by Sinai Health to people with disabilities will be provided in a manner that respects the dignity and independence of people with disabilities.
3. All providers of Sinai Health's goods and services will communicate with people with disabilities in ways that take into account their disability and services will be provided according to individual needs.
4. All goods and services provided by Sinai Health to people with disabilities will be integrated into standard practice unless an alternate measure is necessary, to enable a person with a disability to obtain, or benefit from the goods or services.
5. Sinai Health will make information about emergency procedures, plans or public safety that is available to the public available in an accessible format upon request.
6. Sinai Health will provide information to the public in an accessible format upon request.
7. Sinai Health's internet websites and web content will conform with the World Wide Web Consortium Web Content Accessibility Guidelines in accordance with the schedule set out in the integrated accessibility standard.
8. Education and training resources or materials will be provided in an accessible format taking into account the needs due to disability of the persons receiving the education.
9. Sinai Health will meet the requirements as set in the schedule of the Integrated Accessibility Standard for all areas of employment. (Accommodation, Recruitment)
10. Sinai Health will provide individualized workplace emergency response information to employees who have a disability if aware of the need for accommodation due to the employee's disability (Emergency Response Planning for Employees with Disability)
11. People with disabilities have the right to use their own personal assistive devices while accessing the goods or services provided by Sinai Health, 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. (Patient Owned Medical and Non-Medical Devices) If the device appears to be unsafe, the hospital will endeavour to find an appropriate substitute device.
12. Sinai Health staff will have knowledge that assistive devices are available at Sinai Health and have access to staff members with knowledge of appropriate use of the device. A number of assistive devices are available at Sinai Health for people accessing goods and services provided by Sinai Health. (eg. TTY for personal use, Locating and on pay phone, Pocket Talker Hearing device, telephone amplifier) Accessibility website, Assistive Devices for Hearing Impaired policy, InfraRed policy
13. People with disabilities who use a service animal have the right to enter Sinai Health with the animal and keep the animal with them in accordance with the Service Animal Policy.

	<b>POLICY No:</b>	I-d-65-73
<b>TITLE:</b>	Providing Access for People with Disabilities	

14. People with disabilities who are accompanied by a support person have the right to have access to that support person while accessing the goods and services of Sinai Health.
15. Sinai Health will provide notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if available.
16. Sinai Health will establish, implement, maintain and document a multi-year accessibility plan outlining Sinai Health's strategy to prevent and remove barriers and meet its requirements under AODA and the supporting standards.
17. Sinai Health will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities through a variety of methods including asking potential suppliers about accessible options they offer and accessibility criteria in all sourcing documents where applicable eg. RFP, RFQ. Tools and resources are available to assist employees in the completion of procurement documentation (Ontarians with Disabilities Act Procurement Checklist from Ontario Public Service Supply Chain management)
18. Sinai Health will incorporate accessibility features when designing, procuring or acquiring self-service kiosks.
19. All Sinai Health employees, volunteers, contractors and any other people who interact with the public on behalf of Sinai Health will receive training on the requirements of the accessibility standards as well as providing customer service to people with disabilities. A variety of methods will be used including: e-learning, booklet, in-service education, and new employee orientation.

Training will include:

- a. The purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- b. Requirements of the accessibility standards and Ontario Human Rights Code.
- c. How to interact and communicate with people with various types of disabilities.
- d. How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- e. How to access and use in-house resources or devices , e.g. TTY, lifts available on Sinai Health's premises or otherwise that may help with the provision of goods or services to people with disabilities.
- f. What to do if a person with a disability is having difficulty in accessing Sinai Health's goods and services.

	<b>POLICY No:</b>	I-d-65-73
<b>TITLE:</b>	Providing Access for People with Disabilities	

- g. Sinai Health's policies, practices and procedures relating to providing access to people with disabilities and all aspects of this program.
- h. Sinai Health has a process to receive feedback on the provision of goods and services provided to people with disabilities accessing service at Sinai Health.

### **Process for Providing Feedback**

The process for responding to feedback on how Sinai Health provides goods and services to people with disabilities is as follows:

#### **Patients**

- 1. The feedback will be received by a member of the person's health care team.
- 2. The member of the health care team will respond.
- 3. If the concerns require further attention, the Patient Relations Unit at 416-586-4800 Ext. 5066 will be contacted.
- 4. The concern will be managed via the standard process used for patient concerns.

#### **Visitors**

- 1. Visitors will address their concerns through the Patient Relations Unit

#### **Employees/Contractors/Third Party Agents**

- 1. The feedback will be received by the supervisor of the area.
- 2. If the concerns require further attention, the Occupational Health Wellness and Safety department will be contacted.
- 3. For accommodation at any point in the hiring process, contact Hiring Process Accommodation in confidence at 416-586-4800 X. 7050 or [HiringProcessAccommodation@mtsinai.on.ca](mailto:HiringProcessAccommodation@mtsinai.on.ca).

### **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
- b) of the forgoing, includes diabetes mellitus, epilepsy, a brain injury, any
- c) degree of paralysis, amputation, lack of physical co-ordination, blindness or
- d) visual impediment, deafness or hearing impediment, muteness or speech impediment,
- e) or physical reliance on a guide dog or other animal or on a wheelchair or other
- f) remedial appliance or device,
- g) a condition of mental impairment or a developmental disability.
- h) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- i) A mental Health disorder, or

	<b>POLICY No:</b>	I-d-65-73
<b>TITLE:</b>	Providing Access for People with Disabilities	

- j) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.”(reference AODA, 2005)

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 Animals:**

**Service Animal** - an animal for a person with a disability, if (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.

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 dog trained as a guide 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 is a dog that 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)”