

Accessibility Policy

COR-CORP-ADM-15233-09-01-2022

Manual	Cluster	Theme
Corporate	Corporate	Administration

Policy Preamble

Holland Bloorview's Accessibility policy reflects the requirements of the Accessibility for Ontarians with Disability Act 2005 (AODA) including the Customer Service Standards, the Integrated Accessibility Standards regulation and the Ontario Human Rights Code. Our commitment is to provide individuals with disabilities with the opportunity to access all of our services and to ensure that every individual who accesses Holland Bloorview's services is treated in a manner that respects the dignity and independence of people with disabilities. This policy is in alignment with our [Mission, Vision and Values](#) and reflects the sentiments outlined in the [Holland Bloorview Code of Conduct](#).

Policy Statement

This policy outlines the process to ensure all members of Holland Bloorview Kids Rehabilitation Hospital employees, volunteers, contractors any other individuals who interact with the public on behalf of Holland Bloorview comply with the Customer Service Standards set out in the [Accessibility for Ontarians with Disability Act 2005 \(AODA\)](#) as well as the [Integrated Accessibility Standards regulations \(2014\)](#) and the [Ontario Human Rights Code](#) as it relates to persons with disabilities.

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Procedure

Policy Scope

Holland Bloorview's Accessibility policy reflects the requirements of the Accessibility for Ontarians with Disability Act 2005 (AODA) and the Ontario Human Rights Code. Our commitment is to provide individuals with disabilities with the opportunity to access all of our programs and services without experiencing barriers and to ensure that our staff, clients, volunteers, students and families are trained in a manner that respects the needs, concerns, values, and independence of people with disabilities. This policy is in alignment with our Mission, Vision and Values and reflects the sentiments outlined in the Holland Bloorview Code of Conduct.

Principles of the Accessibility Policy

Holland Bloorview Accessibility Policy is guided by the following principles:

- Dignity – Provide service in a way that allows the person with a disability to maintain self-respect and the respect of other people.
- Independence – People with a disability is allowed to do things on their own without unnecessary help or interference from others.
- Individuality – People with disabilities neither share the same experience nor the same relationship towards their disability as one another. Other factors related to their life along with their intersecting identities can influence how they both navigate the world and how they interpret meaning from it. All staff and volunteers receive regular training to better understand the

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uniqueness of a patient's situation and to avoid projecting one's own values and judgements on to them, which could negatively impact care provision.

- Integration – Provide service in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless a different way is necessary to enable them to access goods, services or facilities.
- Equality of Outcome - Provide service to a person with disability in such a way that we are committed to principles of equity, accessibility and inclusion of employees with disabilities and to provide appropriate accommodations when needed to address individual diversity/needs.

Roles and Responsibilities

Accessibility is a shared responsibility and everyone has a part to play in ensuring that Holland Bloorview is accessible to all clients, families, staff, volunteers, external service providers and community members.

Employees, Volunteers and Third Parties

All employees, volunteers and third parties acting on behalf of the hospital must:

- Be familiar with their rights and responsibilities under the policy
- Identify, remove and prevent accessibility barriers using the Equity,

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Diversity and Inclusion lens

- Facilitate requests received for accommodations from clients, families, employees and volunteers in a timely manner
- Ensure that the hospital feedback processes are accessible and inclusive for persons with disabilities
- Ensure that all information and communication materials produced meet requirements of the accessibility standards. When an individual requests these materials in alternate formats, such as Braille, electronic or large print. Staff in consultation with the person requesting accommodations should provide the materials without any additional charge
- Attend mandatory AODA trainings, as well as, any additional training that is appropriate to their role
- Consult with immediate manager first to facilitate the process of disability accommodations

Managers

Supervisors must:

- Ensure that the policy is communicated to all hospital employees and those acting on behalf of the hospital
- Promote awareness of the policy within their area of responsibility
- Attend mandatory training and ensure that staff receive training appropriate to the duties of their role
- Consult with the Equity, Diversity and Inclusion office for guidance

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and assistance with any accessibility concerns

- Process accommodations requests from employees with disabilities. When accommodations requested fall outside of manager's area of responsibility or beyond their capacity, contact your divisional VP and then Manager IDEAA.

Senior Management Team (SMT)

- Ensure that resources for accessibility are budgeted within your operational budgets to identify, remove and prevent accessibility barriers and to provide accommodations, when requested by staff
- Provide oversight for the implementation of this policy as well as compliance with the AODA
- Complete AODA compliance reporting sections when requested by the executive lead

Holland Bloorview Accessibility Planning Advisory Committee

As a hospital and publicly funded facility in Ontario, Holland Bloorview Kids Rehabilitation Hospital must be in compliance with its obligations under the Accessibility for Ontarians with Disabilities Act (AODA), 2005. One of the requirements of the AODA is that Holland Bloorview consults with individuals with a disability when developing and implementing multi-year Accessibility Plans. To guide the implementation of the Accessibility Plan, Holland Bloorview has established an Accessibility Planning Advisory

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Committee, where majority of the members self-identify as persons with disabilities.

The primary focus of this committee will be to - facilitate and monitor development and implementation of the Multi-Year Accessibility Plan ([link](#)), provide guidance on what the plan should include and review progress made by the hospital through an annual status report and compliance report. The committee will also provide guidance to the hospital on the removal of barriers faced by persons with disabilities.

AODA Requirements for Holland Bloorview

Accessibility standards are laws that the government, businesses, non-profits and public sector organizations must follow to become more accessible. They help organizations identify and remove barriers to improve accessibility for people with disabilities in 5 areas of daily life. The AODA is made up of five standards as well as a number of General Requirements. These standards are:

1. Customer Service Standard
2. Information and Communication Standard
3. Employment Standard,
4. Transportation Standard
5. Design of Public Spaces Standard

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All of these standards are consolidated within the Integrated Accessibility Standards Regulation (IASR).

Note: Currently, there are still no AODA standards for Healthcare and Education. However, as of 2022, recommendations of guidelines which include an enforcement framework for accessibility in Healthcare and Education have been submitted. Implementing and enforcing these standards will help us reach our goal of an accessible Ontario by 2025. Following is a list of the specific AODA requirements that applies to the Holland Bloorview:

AODA General Requirements

Holland Bloorview will ensure the general requirements of the Integrated Accessibility Standards Regulation under the AODA are met to ensure accessibility for persons with disabilities and of our current processes.

Accessibility Policy - O. Reg. 191/11, s. 3 (1)

The AODA requires Holland Bloorview to maintain one or more policies governing how the organization will achieve the requirements of the IASR. The hospital must also make such documents available to the public in an accessible format. This accessibility policy has been developed to be in compliance with this requirement.

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Multi-Year Accessibility Plan O. Reg. 191/11, s. 4 (1)

The AODA requires the hospital to establish, implement, maintain and make public a Multi-Year Accessibility Plan (provide link). This plan outlines the hospital's strategy to identify, remove and prevent barriers as well as to meet the legislative requirements of the IASR. The plan must be developed in consultation with the Accessibility Planning Advisory Committee as well as people with disabilities. The plan must be made available to the public as well as in an accessible format or with communication supports upon request on the hospital's website.

Procurement of Goods and Services O. Reg. 191/11, s. 5 (1); O. Reg. 413/12, s. 5 (1).

Holland Bloorview must incorporate accessibility criteria and features when acquiring goods, services or facilities. Any third party who provides goods and services on behalf of Holland Bloorview must ensure that their staff has received appropriate training as required by the IASR.

Training O. Reg. 191/11, s. 7 (1-4)

The AODA requires that all employees, volunteers and persons who participate in hospital policies must receive training pertaining to the AODA, the Ontario Human Rights Code and Accessible Customer Service. Training must take place as soon as possible upon hire and be relevant to a person's role. The hospital must keep a record of the training provided to employees and volunteers as well as the dates during which the training

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took place and the individuals trained. Currently all new employees are assigned the following mandatory e-learning modules upon hire and completion is tracked by their managers using the hospital's web-based learning management system called WISE.

AODA 1 – Accessible Customer Service

AODA 2 – How to Provide Accessible Customer Service

AODA 3 – Integrated Accessibility Standards Regulation and the Human Rights Code

Information and Communication Standards Feedback O. Reg. 165/16, s. 11 (1)

The hospital must have an accessible feedback process in place to receive and respond to feedback and shall ensure that the processes are accessible to persons with disabilities by providing or arranging accessible formats and communication supports, upon request. The hospital must notify public about the availability of these provisions.

Accessible Formats and Communication Supports O. Reg. 191/11, s. 12 (1)

The AODA requires that all information and communications that the hospital produces must be made available in accessible formats upon request. When a request is made, the hospital must consult with the person making the request to determine which format or communication

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support is required and to make arrangements for providing materials in a reasonable amount of time at no additional cost charge to person making the request.

Emergency Procedures, Plans and Public Safety Information O.

Reg. 191/11, s. 13 (1)

The AODA requires that the hospital prepares emergency procedures, plans or public safety information and makes available to the public and must be made available in an accessible format or with appropriate communication supports as soon as possible, upon request.

Accessible Websites and Web Content O. Reg. 191/11, s. 14 (1)

The AODA requires that the hospital's internet and intranet website and web contents conform to World Wide Web Consortium Web Content Accessibility Guidelines 2.0 at Level AA.

Employment Standards

Holland Bloorview will foster an inclusive workforce and provide equitable treatment and accommodation to ensure barrier-free employment. This section of the policy addresses the IASR Employment Standards under the AODA and is applicable to employees only. It does not apply to volunteers and other non-paid individuals.

Recruitment, General O. Reg. 191/11, s. 22

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Holland Bloorview must notify its employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process.

Recruitment, Assessment and Selection Process O. Reg. 191/11, s. 23 (1)

Holland Bloorview must notify job applicants, when they are individually chosen to participate in an assessment or selection process that accommodations are available upon request in relation to materials or processes to be used. Successful applicants must be notified of accommodations in their written Offer of Employment. The hospital must consult with the applicant who has requested an accommodation to ensure the accommodation provided addresses the individualized needs of the individual seeking accommodations.

Informing Employee of Supports O. Reg. 191/11, s. 25 (1- 3)

Holland Bloorview employees must be made aware of the policies used to support new employees with disabilities and provide relevant information upon starting their new role and provide accommodations in accordance with the Ontario Human Rights Code ([link to Ontario Human Rights Code](#)) This information is provided through employment agreements and orientation materials.

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Accessible Formats and Communication Supports for Employees O. Reg. 191/11, s. 26 (1)

In accordance with the Ontario Human Rights Code (provide digital link), Holland Bloorview must provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed to perform the employee's job
- Information that is generally available to employees in the workplace

Holland Bloorview must consult with the employee making the request in determining the accessible format or communication support.

Workplace Emergency Response Information O. Reg. 191/11, s. 27 (1)

Holland Bloorview will provide individualized emergency response information to employees who have a disability, if disability is such that the individualized information is necessary and the hospital is aware of the need for disability accommodations in emergency situations. If an employee requires assistance, the hospital must receive consent from the employee to share that information with individuals who will be providing assistance. This information must be reviewed when needs change, employee moves locations within the organization or when the general emergency plan is reviewed.

Documented Individual Accommodation Plans O. Reg. 191/11, s. 28 (1 - 4)

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The hospital should have mandatory processes for the development and maintenance of documented individual accommodation plans to support employees with disabilities. These processes meet the requirements set out in the O. Reg. 191/11, s.28 (2-4). For example, individual accommodation plans may include information regarding accessible formats and communication supports as well as workplace emergency response information that an employee will need.

Return to Work Process O. Reg. 191/11, s. 29 (1)

The hospital must have in place a documented return to work process for employees returning to work from an illness or disability where accommodations are required. These processes are supported by Occupational Health and Wellness.

Performance Management O. Reg. 191/11, s. 30 (1)

Holland Bloorview will ensure that employees with disabilities or individual accommodation plans are provided for equitable access to performance management process.

Career Development and Advancement O. Reg. 191/11, s. 31 (1)

Holland Bloorview will ensure that employees with disabilities are provided for equitable access to career development and advancement opportunities by taking into consideration their accessibility needs.

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Redeployment O. Reg. 191/11, s. 32 (1)

Holland Bloorview when using redeployment shall take into account the accessibility needs of its employees with disabilities as well as individual accommodation plans, when redeploying employees with disabilities.

Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

The Ontario Building Code which has a section on Barrier-Free Design and the AODA, IASR Design of Public Spaces Standards are both standards to which the hospital must adhere.

Customer Service Standards

Use of Service Animals and Support Persons O. Reg. 191/11, s. 80.47 (1); O. Reg. 165/16, s. 16

Holland Bloorview Kids Rehabilitation Hospital encourages people with disabilities to be accompanied by a support person when needed, and allows them to have complete access to that support person. While accessing services, where fees apply to individuals with a disability (i.e. training sessions, swim programs), there will be no fee charged to support persons. Service animals are permitted in our facility.

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Support persons (excluding agency hired) that will have access to personal health information of other individuals within Holland Bloorview Kids Rehabilitation Hospital must sign a confidentiality agreement.

Signed confidentiality agreements by support persons will be stored in the corresponding areas based on who they are accompanying:

- a. Staff: Occupational Health under People and Culture,
- b. Students: Teaching and Learning, and
- c. Volunteers: Better Impact System.

[Confidentiality Agreement for Externally Hired Support Persons](#)

If a service animal is not permitted in specific areas because they are prohibited by law (i.e. food preparation areas), Holland Bloorview Kids Rehabilitation Hospital will make every effort available to seek out an alternative method to support the person with a disability. Certain breeds of animals may also be prohibited by law (i.e. Dog Owner's Liability Act). Where there is a risk to the health and safety of another person as a result of the presence of a service animal (i.e. allergy), consideration will be given to options available prior to exclusion of the service animal as outlined in the [Service Animal Policy](#).

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Self-Serve Kiosks

Self-service kiosks are electronic terminals that users can interact with. Clients are able to access products or services without staff assistance. Self-service kiosks should have technical features so that everyone can access them independently. Features such as good colour contrast on display screens makes kiosks accessible for people with visual impairments. Similarly, audio output allows individuals to hear the instructions on the screen. Self-service kiosks should also have accessible structural features. Kiosks should be at a height which customers can reach while using their assistive devices, Kiosks should be stable. Lastly kiosks should have tactile keyboards, as well as headphone jacks and volume controls. These features allow individuals making use of a kiosk's speech output to perform tasks quietly and confidentially without assistance. Holland Bloorview will ensure that all new self-serve kiosks are accessible to its community members. The hospital will ensure that accessibility is taken into account when they design, procure, or acquire new kiosks.

Notice of Service Disruptions O. Reg. 191/11, s. 80.48 (1); O. Reg. 165/16, s. 16

Holland Bloorview Kids Rehabilitation Hospital shall provide notice in the event of an unplanned or scheduled disruption in services.

Information will include: reason for the disruption, anticipated duration and alternative options for provision of service, if available,

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during the disruption. Information will be provided on Holland Bloorview Kids Rehabilitation Hospital's website, using the outgoing voicemail message, through direct communication in close proximity to the affected areas (sign/poster) communicating the disruption in service.

Training for Staff (In addition to s.7) O. Reg. 191/11, s. 80.49 (1); O. Reg. 165/16, s. 16

In addition to the requirements in section 7 of the AODA General Requirements, the hospital shall ensure that the following persons receive specific training about the provision of the hospital's goods, services or facilities, as the case may be, to persons with disabilities:

1. Every person who is an employee of, or a volunteer with, the hospital.
2. Every person who participates in developing the hospital's policies.
3. Every other person who provides goods, services or facilities on behalf of the hospital. O. Reg. 165/16, s. 16.

This additional training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:

1. How to interact and communicate with persons with various types of disability.

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2. 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.
3. 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, services or facilities to a person with a disability.
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities. O. Reg. 165/16, s. 16.

AODA Reporting Requirements

As a hospital and publicly funded facility in Ontario, Holland Bloorview Kids Rehabilitation Hospital must comply with the Accessibility for Ontarians with Disabilities Act (AODA), 2005. The hospital must submit a completed compliance report to the province every two years in accordance with the schedule set out in the AODA to confirm that the current accessibility requirements have been met.

Notice of Availability of Policy Documents

This accessibility policy will be maintained and updated by the Inclusion, Diversity, Equity, Accessibility and Anti-Racism Office and available on the hospital's internal and external websites. The policy must be provided to persons upon request, in an alternative format or with communication supports.

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Glossary of Terms

Accessibility

A concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and also refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required and access by people with a variety of disabilities.

Accessible Formats

Refers to formats that are usable by persons with disabilities including but not limited to: large print, recorded audio, electronic formats and Braille.

Accommodation

In the context of Human Rights, accommodation means preventing and removing barriers caused by attitudinal, systemic, physical, information or communications, and technology barriers that unfairly exclude individual or groups protected by Ontario's Human Rights Code from having equal access to full benefits available to others. Principles of accommodation include dignity, individualization and inclusion or integration. For more information refer to Ontario's Human Rights Code (<https://www.ontario.ca/laws/statute/90h19>)

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Barrier

Defined by the AODA as anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or practice.

Career Development and Advancement

Defined by the AODA, as the provision of additional responsibility within an employee's current position or movement from one job to another within the organization that may be higher in pay, provide greater responsibility or be at a higher level within the organization.

Communications Supports

Includes, but is not limited to captioning, alternative and augmentative communications supports, plain language, sign language and other supports that facilitate effective communications.

Support Person

In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities. ("personne de soutien"). O. Reg. 165/16, s. 16.

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External Links

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

Attachments

[Confidentiality Agreement for Externally Hired Support Persons](#)

Forms

Related Policies

[Equity, Diversity and Inclusion](#)

Committee	Review Date

Policy Lead	Last Revised	Last Reviewed
Lorraine Thomas	13 December 2023	12 July 2024