

Accessibility for Ontarians with Disabilities Act (AODA) Policy	Section: Health Equity & Interpretation
Effective Date: January 1, 2013	Original Date: 01/13 Revision Dates: 12/19, 10/22

Policy Statement

Headwaters Health Care Centre (“Headwaters”) 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, 2005](#) (AODA) and Ontario’s accessibility laws.

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

Headwaters understands that obligations under the 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.

Headwaters 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.

Procedure

Training

We are committed to training all staff and volunteers in 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:

- a) all persons who participate in developing the organization’s policies; and
- b) all other persons 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.

These include:

1. Wheelchairs, canes and/or walkers
2. TTY phone lines
3. Large print materials

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 provided including the dates on which the training was provided and the number of individuals to whom it was provided.

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 e.g., support person.

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.

Communication

We communicate with people with disabilities in ways that consider their disability. This may include the following:

- 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.

We will work with the person with disabilities to determine what method of communication works for them.

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

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- 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

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services, or facilities:

- Explain why the animal is excluded
- Discuss with the customer another way of providing goods, services, or facilities

Service animals are restricted from entering the following areas:

- Food preparation and food storage areas
- Medication preparation or storage areas
- Clean or sterile supply storage areas
- Isolation rooms
- Restricted access areas such as procedure and treatment rooms

In cases, where the animal is excluded by law from the premises (*Dog Owner's Liability Act, Ontario; The Health Protection and Promotion Act, Ontario Regulation 56 Section 60*), Headwaters will ensure that other measures are available to enable the person with the disability.

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.

In certain cases, Headwaters 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
- Others on the premises

Before deciding, Headwaters 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

If Headwaters determines that a support person is required, we will waive the admission fee or fare (if applicable) for the support person.

Notice of Temporary Disruption

If there is a disruption of a particular facility or service used to allow a person with a disability to access the goods or service, Headwaters will give notice of the disruption to the public, by posting the reason for the disruption, the anticipated duration of the disruption and describe alternative facilities or services that may be available. This information will be posted in a conspicuous place in the premises or by other methods considered reasonable. If the disruption is expected, a reasonable amount of advanced notice of the disruption will be given. If the disruption is unexpected, notice will be provided as soon as possible.

Feedback Process

Comments on our services regarding how well those expectations are being met are welcome and appreciated. Patients, family members, staff, volunteers, physicians, and the public have an opportunity to provide feedback on the accessibility of provisions of goods and services by Headwaters through the *Inclusion, Diversity, Equity and Accessibility* committee by:

- a) Mail addressed to President's Office, 100 Rolling Hills Drive, Orangeville, ON L9W 4X9
- b) Phone at 519-941-2410 extension #2248, Communications Department
- c) In person President's Office, 100 Rolling Hills Drive, Orangeville, ON L9W 4X9
- d) Website, IDEA@headwatershealth.ca

Staff, volunteers, and physicians may contact the Human Resources Department or Occupational Health to report any concerns they may have, at hr@headwatershealth.ca

All feedback, including complaints, will be handled in the following manner:

- a) Reviewed by Human Resources and/or Occupational Health

Complainants can expect to hear back in ten (10) business days.

Headwaters ensures our 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

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

Headwaters 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

We will incorporate accessibility features/consider accessibility for people with disabilities when designing, procuring, or acquiring self-service kiosks.

Procurement

We 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.

Information and Communications

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that consider their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) In a timely manner, considering the person's accessibility needs due to disability; and
- b) 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:

- a) An explanation as to why the information or communications are unconvertible; and
- b) A summary of the unconvertible information or communications.

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

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

Employment

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that considers the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) Information that is needed in order to perform the employee's job; and
- b) Information that is generally available to employees in the workplace

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 aiding that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) When the employee moves to a different location in the organization.
- b) When the employee's overall accommodations need, or plans are reviewed; and
- c) When the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes consider the accessibility needs of all employees.

Design of Public Spaces

We will meet accessibility laws when building or making major changes to public spaces. Our public spaces include:

- a) In-Patient care areas
- b) Outpatient clinics and care areas e.g., Dialysis, Fracture Clinic, Diagnostic Imaging
- c) Emergency Department
- d) Welcome Centre
- e) Registration
- f) Parking lots and grounds
- g) Foundation Office
- h) Cafeteria
- i) Washrooms

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.

References

- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*
- Multi-Year Accessibility Plan (2022-2024)
- Integrated Accessibility Standards (or Ontario Regulation 191/11)
- The Health Protection and Promotion Act, Ontario Regulation (562 Section 60)*
- Dog Owners' Liability Act, Ontario Regulation (562 Section 60)*
- Ontario Human Rights Code

Approval Date	Approval Body	Approval Signature: [mm/yy]
Oct 2022	Senior Management Team	