PRHC
Peterborough Regional
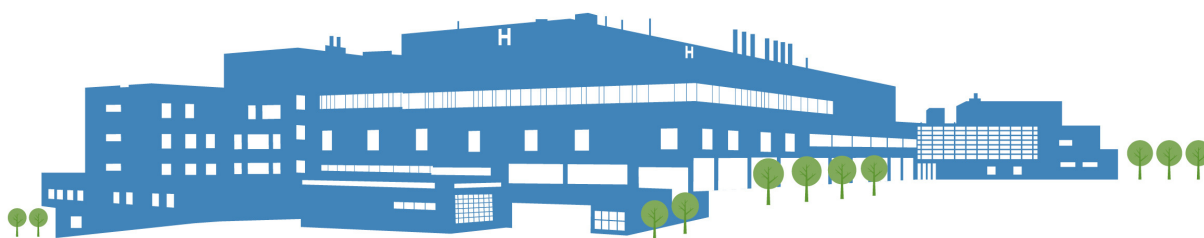Health Centre

Accessibility Plan

2017-2022

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A Message from the President & CEO

Peterborough Regional Health Centre (PRHC) is committed to offering a healthcare environment that assures individuals with disabilities equal access to hospital information, programs and services.

The Health Centre has an Accessibility Working Group in place to support us in complying with the Accessibility for Ontarians with Disabilities Act (AODA), established by the Government of Ontario in 2005. This Working Group, made up of PRHC leaders and staff, works to champion the PRHC Accessibility Plan by promoting accessibility education and initiatives, as well as identifying and eliminating barriers for the benefit of patients, visitors and staff. The committee also reviews the hospital's Accessibility Plan and policies annually, in order to ensure these documents are up-to-date with current provincial accessibility requirements. The corporate Accessibility Plan is posted on the Health Centre's public website at www.prhc.on.ca/cms/accessibility.

Making our information, programs and services accessible to all patients, visitors and staff is our legal responsibility and our ethical obligation as healthcare professionals. Our goal is to ensure we are in compliance with all required legislation, and where possible, ensure we exceed those requirements.

Only by working together to learn, understand and comply with our responsibilities and by continually challenging ourselves to find new and better ways to support accessibility will we be able to provide equal access to high quality, patient and family-centred care for the people of our community and our region.

Dr. Peter McLaughlin
President & CEO

Introduction

Peterborough Regional Health Centre (PRHC) is committed to the ongoing identification, prevention and removal of barriers to persons with disabilities. A barrier is anything that makes it challenging or impossible for a person with a disability to access a service, program or a building.

This could include:

- A physical barrier, such as a feature of a building or outdoor space that presents a challenge for a person with a physical disability;
- An information or communication barrier that would make it difficult for a person to easily understand information, such as print that is too small to read; or
- A technological barrier, such as a website that does not support screen-reading software.

The Accessibility Plan is created in accordance with the *Ontarians with Disabilities Act, 2001* (ODA) and the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). The Plan is a multi-year document spanning five (5) years, and will be reviewed and updated annually as necessary.

In 2005, the government of Ontario passed the AODA, which requires that Ontario be an accessible province by 2025. To help public, private and non-profit organizations identify, prevent and remove barriers to accessibility, the AODA outlines accessibility standards in a number of areas, including:

- Customer service
- Information and communications
- Employment
- Transportation
- The built environment

The accessibility standard for customer service came into force in 2008. The next three standards – information and communications, employment and transportation – have been combined into the *Integrated Accessibility Standards Regulation* (IASR). The IASR is now law and the requirements will be phased in over time. The standards for the built environment (for facilities and outdoor spaces) are still in development.

Objectives of the Accessibility Plan
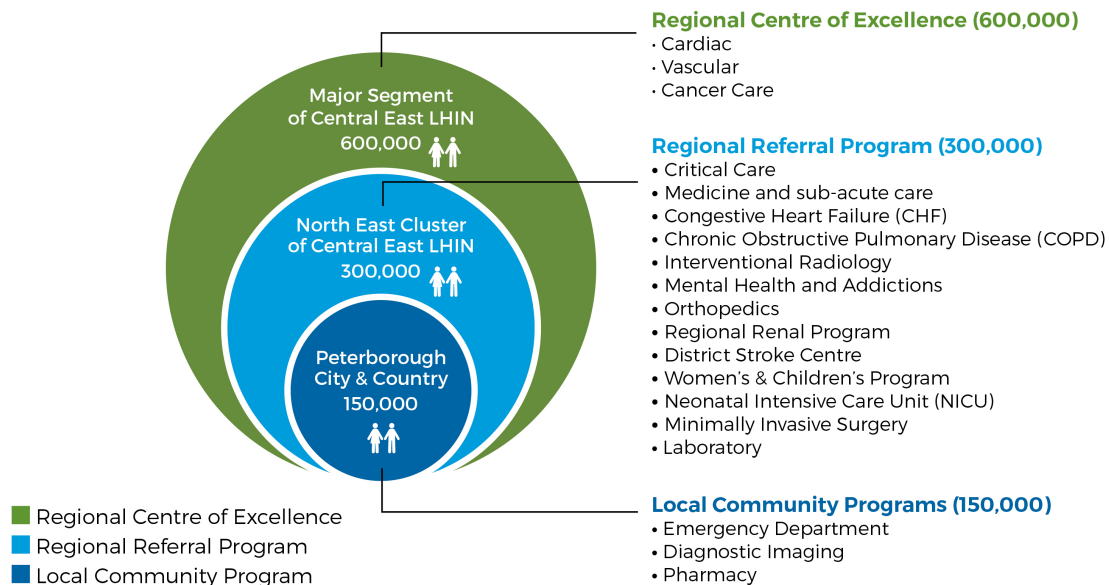
This Plan:
- Describes the process by which the Health Centre (through the Accessibility Working Group) will identify, prevent, reduce and/or remove barriers to persons with disabilities
- Outlines the process by which the status of each barrier is reviewed and monitored
- Outlines the process by which new barriers are identified and included in future Accessibility Plans
- Identifies policies to be developed per AODA requirements
- Describes training requirements for staff
- Describes how PRHC will make the Accessibility Plan & Policies available to the public.

About Peterborough Regional Health Centre

Peterborough Regional Health Centre (PRHC) is a regional hospital serving a population of 300,000 people in Peterborough and the surrounding region – a population we anticipate will continue to grow over the next 10 years.

PRHC has more than 400 inpatient beds, a wide variety of outpatient and community-based services, and one of the busiest Emergency Departments in Ontario.

Our hospital is also the region's largest employer with more than 2,200 staff, 400 physicians with privileges, and 600 volunteers.

Major Segment of Central East LHIN 600,000

North East Cluster of Central East LHIN 300,000

Peterborough City & Country 150,000

Regional Centre of Excellence
Regional Referral Program
Local Community Program

Regional Centre of Excellence (600,000)
· Cardiac
· Vascular
· Cancer Care

Regional Referral Program (300,000)
• Critical Care
• Medicine and sub-acute care
• Congestive Heart Failure (CHF)
• Chronic Obstructive Pulmonary Disease (COPD)
• Interventional Radiology
• Mental Health and Addictions
• Orthopedics
• Regional Renal Program
• District Stroke Centre
• Women's & Children's Program
• Neonatal Intensive Care Unit (NICU)
• Minimally Invasive Surgery
• Laboratory

Local Community Programs (150,000)
• Emergency Department
• Diagnostic Imaging
• Pharmacy

The Accessibility Working Group

PRHC's Accessibility Working Group was established in 2002. Membership includes an Executive Sponsor and representatives from:

- Human Resources
- Volunteer Services
- Direct patient care services
- Patient Relations
- Communications

- Occupational Health, Safety & Wellness
- Building Services
- Procurement
- Our community (Patient/Family)

The Accessibility Working Group conducts its functions under the following assumptions:

- Improving accessibility is a shared responsibility
- Team members will work cohesively and will inform their immediate supervisors regarding their commitment and the work effort to participate on the team.
- Team members will provide active communication and liaison between the Accessibility Team and their hospital unit/department or community constituency
- Development of the PRHC Accessibility Plan is mandated by the *Accessibility for Ontarians with Disabilities Act, 2005* and is strongly supported by senior levels of administration at Peterborough Regional Health Centre.

The working group welcomes input from people with disabilities and other individuals who are willing to provide their feedback regarding issues they have identified during their visits to PRHC. Please contact us by email at: accessible@prhc.on.ca

Status of Accessibility Legislation in Ontario

Ontarians with Disabilities Act, 2001
In 2001, the Provincial government enacted the *Ontarians with Disabilities Act, 2001* (ODA). This Act required organizations within the public sector (the provincial government, municipalities, hospitals, educational institutions and public transportation providers) to undertake activities aimed at reducing and eliminating barriers to persons with disabilities.

Accessibility for Ontarians with Disabilities Act, 2005
In 2005, the Provincial government passed the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). The AODA requires the development of accessibility standards in five areas: customer service; information and communications; employment; transportation and the built environment.

Accessibility Standards for Customer Service
The first Regulation enacted under the AODA was *Ontario Regulation 429-07– Accessibility Standards for Customer Service*. Designated public sector organizations were to be in compliance by January 1, 2010 and submit a compliance report to the Provincial government by March 31, 2010. PRHC submitted its compliance report in advance of the deadline, indicating it had addressed the requirements of the Regulation and had met its compliance obligations.

Goals – Customer Service Accessibility Standard	Status
Establish policies, practices and procedures for providing goods or services to persons with disabilities	√
Ensure that policies, practices and procedures are consistent with the core principles of independence, dignity, integration and equality of opportunity	√
Communicate with a person with a disability in a way that takes their disability into account	√
Establish a policy to allow people to use their own personal assistive devices to access our services	√
Allow people with disabilities to be accompanied by their guide dog or service animal in those areas of our premises that are open to the public, unless the animal is excluded by law	√
Permit persons with disabilities who use a support person to bring the person with them while accessing services	√
Train staff, physicians, volunteers and any other people who interact with the public on our behalf on a number of topics as outlined in the Customer Service Standards	√
Establish a process for people to provide feedback on how our organization provides care or services to people with disabilities and how to respond to their feedback and take action on their concerns	√
Provide notice when facilities or services that people with disabilities rely on are unavailable	√

Integrated Accessibility Standards (IASR)

The IASR was enacted in July 2011. It includes a number of general and specific accessibility requirements in the areas of information and communications, employment and transportation The requirements have compliance dates ranging from when the IASR was enacted (July 2011) to the year 2021. The requirements apply to the public, private and not-for-profit sectors. The sections of the IASR that most impact PRHC are those related to accessible information and communications, and employment. As PRHC is not a provider of public transit, the transportation requirements do not apply.

The categories and requirements addressed in the Regulation (except those related to accessible transportation) are summarized below.

General Requirements
- Development of an integrated accessibility standards policy;
- Development of a multi-year accessibility plan;
- Annual reporting on the progress of the multi-year accessibility plan;
- Training staff and volunteers on the requirements of the Regulation and the *Ontario Human Rights Code*, as it pertains to people with disabilities; and,
- Ensuring that accessibility considerations and features are reflected in procurement processes.

Information and Communications
Organizations are required to create, provide and receive information and communications in ways that are accessible to people with disabilities. The specific requirements include the following:

- Ensuring that feedback processes are accessible, upon request;
- Providing accessible formats and communication supports, upon request;
- Providing publicly available emergency procedure, plans or public safety information in accessible formats, upon request; and,
- Improving the accessibility of websites and web content.

Employment

Employers are required to provide for accessibility across all stages of the employment cycle and integrate accessibility into regular workplace processes. The specific requirements include the following:

- Notifying employees and the public of the availability of accommodation for applicants with disabilities in recruitment and assessment processes;
- Notifying successful applicants of the availability of accommodations;
- Informing employees of policies to provide support to employees with disabilities;
- Providing accessible formats and communication supports for employees with disabilities;
- Providing workplace emergency response information to employees with disabilities;
- Establishing processes to develop documented individual accommodation plans;
- Developing a return to work process for employees who have been absent from work due to a disability or who require disability-related accommodations to return to work; and,
- Considering the accessibility needs of employees with disabilities and accommodation plans in performance management processes, when providing career development opportunities or when considering redeployment.

Barrier-Identification methodologies

The Accessibility Working Group has used the following barrier-identification methodologies to identify issues and to create annual priorities for the Accessibility Plan.

- Retrospective Post-Discharge Phone Call audits
- Staff feedback using survey data and Impact reports
- Website feedback via accessible@prhc.on.ca email address
- Community Stakeholder consultations
- Periodic review of advances in accessibility-related products and/or trends

Identified Barriers

The Accessibility Working Group continues to address barriers each year. Although some work has been done to eliminate barriers, the Group continues to look at alternative ways to ensure persons with disabilities are not faced with barriers.

Identified Barriers include:
- Physical
- Informational
- Attitudinal
- Architectural
- Communication
- Technological
- Policies and Procedures

Work has been done to remove identified barriers including:
- Large, wide hallways free of clutter to allow easy movement
- Large buttons and voiceover on the elevators
- Door paddles
- Wayfinding plan
- Braille on wayfinding signs
- Wheelchairs and Staxis available at the main entrance
- Accessible public washrooms on all levels of the Health Centre
- TTY phones are available in two locations within the Health Centre
- Parking improvements
- Education to staff regarding tools available to assist persons with disabilities
- Review of Interpreter policy
- Brochure created for staff to assist them in providing accessible customer service

Actions
General Requirements
This section of the Regulation requires:

- Development of accessibility policies and a multi-year accessibility plan
- Annual reporting on the progress of the multi-year plan
- Incorporation of accessibility features and considerations in procurement processes
- Ensuring that staff and volunteers have been trained on the *Integrated Accessibility Standards Regulation* and the *Ontario Human Rights Code*

Regulatory Requirement	Compliance Deadline	Actions to be Taken	Status as of March 1, 2017
Develop Accessibility Polices • Develop, implement and maintain policies, including a statement of organizational commitment • Make policies publically available	January 1, 2013	PRHC has developed a policy that addresses the requirements in the Integrated Accessibility Standards Regulation (IASR) and includes a statement of organizational commitment. The policy is available on PRHC's website.	Complete & Compliant Included in Dec. 31, 2013 Report.
Develop Multi-Year Accessibility Plan • Establish, implement, maintain and document a multi-year accessibility plan • Post multi-year accessibility plan on website and provide in an accessible format upon request	January 1, 2013	A multi-year accessibility plan that sets out how PRHC will comply with requirements of the IASR has been developed. The plan is placed on PRHC's website.	Complete & Compliant Included in Dec. 31, 2013 Report.

Report annually on the multi-year accessibility plan • Prepare an annual status report on the progress of measures set out in the multi-year plan • Post annual status report on website and provide in an accessible format upon request	2014 & Ongoing	Annual status report on progress of multi-year accessibility plan will be developed and shared with Senior Leadership and the Board of Directors	Ongoing
Incorporate accessibility in procuring or acquiring goods, services or facilities • Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so	January 1, 2013	RFP template that Plexxus has adopted and that PRHC will be adopting includes a section 3 titled Compliance with Accessibility Standards.	Complete & Compliant Included in Dec. 31, 2013 Report.
Training • Ensure that training on the IASR and the Human Rights Code as it pertains to persons with disabilities is provided to employees, volunteers, persons who participate in developing policies and others who provide goods, services or facilities on behalf of the organization	January 1, 2014		Complete & Compliant Working Group has made LearnFlex training available to employees, volunteers and persons who participate in developing policies on behalf of the organization. The Working Group is committed to updating IASR training as required and to communicate changes in accessibility requirements to staff as needed.

Information and Communication Standards			
This section of the Regulation includes requirements related to: • Accessible feedback processes • Accessible formats and communication supports		• Publically-available emergency procedures, plans, public safety information • Accessible websites and web content	
Feedback processes • Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing/ arranging for accessible formats and communication supports, upon request • Notify the public about the availability of accessible formats and communication supports	January 1, 2014	As part of the Accessible Customer Service Standard, PRHC created a policy for feedback processes. PRHC's website currently has a statement that documents are available and can be made available in alternate formats upon request. Committee is reviewing feedback methods and processes.	Complete & Compliant Included in Dec. 31, 2013 Report. Updates to the hospital's public website to be completed in 2018; emphasis on accessibility requirements/ enhancements as part of specified requirements. Committee collects and reviews staff and patient feedback to prevent and remove barriers for persons with disabilities. Feedback is collected from patients and families through post discharge phone calls which are reported to the Working Group quarterly. Feedback is collected from staff via email. A project is underway to be completed by June 2018 to enhance awareness of

			accessibility and to collect feedback in alternate formats from staff, patients, visitors and community representative.
Accessible formats and communication supports • Upon request, provide for provision of accessible formats and communication supports for persons with disabilities • Notify the public about the availability of accessible formats and communication supports	January 1, 2015	PRHC's website currently has a statement that documents are available and can be made available in alternate formats upon request. Review how PRHC notifies the public of communication supports available.	**Complete & Compliant** Communications representative has joined the Committee. 2017/2018 focus will be Information and Communication; including ensuring all new web content meets AODA requirements.
Emergency procedures, plans or public safety information • Provide emergency procedures, plans or public safety information that are available publicly, in an accessible format or with appropriate communication supports, upon request	January 1, 2012	Documents can be provided in alternative formats upon request. Emergency procedures at PRHC are not considered public documents.	**Complete & Compliant** Included in Dec. 31, 2013 Report.
Accessible websites and web content • Websites/content to conform to WCAG 2.0 Level AA	January 1, 2021	Review the website and work with IS team to determine the needs for PRHC's website.	**Scheduled for 2017/2018**

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<p align="center">Employment Standards
This section of the regulation includes requirements related to:</p>

- Recruitment, assessment and selection
- Accessible formats and communication supports for employees
- Workplace emergency response

- Return-to-work processes
- Performance management, career development and redeployment
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Recruitment
- Notify employees and the public about the availability of accommodation for applicants with disabilities in recruitment process
- Notify job applicants when selected to participate in an assessment or selection process that accommodations are available
- When making an offer of employment, notify successful applicants of policies for accommodating employees with disabilities
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January 1, 2014
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Review and update postings so they include appropriate wording so persons with disabilities are aware of the availability of accommodations.

Update HR recruitment processes so applicants are made aware of the availability of accommodations.

Review onboarding processes to ensure that policies related to accommodations are more freely shared with new hires.
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Complete & Compliant
All internal and external postings include accessibility statement.

Internal and External application forms include a question pertaining to accessibility.

Standard onboarding email includes language regarding accessibility.
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| Informing employees of supports
• Inform employees of policies to support employees with disabilities | January 1, 2014 | Review onboarding processes to ensure that policies related to accommodations are more freely shared with new hires.

Review and share accommodation policies with existing staff. | Complete & Compliant
Accommodation Policy in HR, approved with input from Occupational Health and Safety and Wellness and posted in the HR Policy Manual.

New employees are provided with information regarding accessibility at the time of hire (on-boarding phase) and provided with an opportunity to discuss any requirements with the Occupational Health Nurse.

Working Group will work with Human Resources to provide education to staff on the accommodation policy. |

Workplace emergency response information • Provide individualized workplace emergency response information to employees who have a disability, as required.	January 1, 2012	Emergency Response procedures are currently made available on the Intranet. They are not currently made available to public. The external website includes a statement that says: 'Accessibility documents can be provided by the Health Centre upon request, and in alternate formats as required'.	Complete & Compliant Included in Dec. 31, 2013 Report. Accessibility Working Group is partnering with emergency response committee to roll out communication and information to employees who require accommodation in the event of an emergency.
Documented individual accommodation plans • Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	January 1, 2014	Letters of Understanding are already in place for individuals who require accommodations for varying reasons.	Complete & Compliant Process included with new Accommodation Policy (HR).
Return-to-work process • Develop and have in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work.	January 1, 2014	Return-to-work processes are in place. Review and update as required.	Complete & Compliant In 2017, return-to-work and modified work processes are under full review, which includes assessment through an accessibility lens.

Performance management, career development and redeployment • Take into account accessibility needs of employees with disabilities and individual accommodation plans as part of performance management processes, when providing career development opportunities and considering redeployment.	January 1, 2014	Existing policies to be reviewed and updated as required.	Complete & Compliant Performance Management policy approved March 2017.

Next Steps

Throughout 2017 and onwards, the Accessibility Working Group will focus on:

- Reviewing and expanding committee membership where necessary; including securing a full-time patient/family representative to advocate a patient and family voice
- Enhancing communication and information-sharing with PRHC employees, volunteers and physicians
- Establishing relationships with community partners on community-based Accessibility Committees
- Meeting the requirements of the IASR associated with training and accessible communication
- Developing an annual update on the multi-year accessibility plan
- Reviewing existing accessibility procedures and updating them as required
- Supporting building projects, such as the plan to establish a fully accessible washroom on every floor
- Piloting accessibility-focused initiatives, such as foldable stadium seating in areas with long hallways as 'rest stops' for people

Review and monitoring process

The Accessibility Working Group will meet a minimum of eight (8) times annually. According to the Terms of Reference, the Accessibility Working Group functions to:

- Raise awareness of accessibility at PRHC and facilitate identification of barriers to access by persons with disabilities
- Provide information and act as a resource to staff on issues related to accessibility for persons with disabilities
- Advocate for and recommend actions to prevent, reduce, and eliminate access barriers
- Prepare the annual Accessibility Plan as required by the new Accessibility for Ontarians With Disabilities Act, 2005
- Monitor access for disabled persons within the hospital, in partnership with Risk Management
- Audit accessibility measures to ensure sustained access

The Accessibility Working Group is responsible for monitoring and following up on recommendations identified in the annual Accessibility Plan. The Accessibility Working Group will also receive and review responses to complaints related to accessibility on a quarterly basis, and make recommendations for future action.

Communication of the Plan

The PRHC Accessibility Plan will be posted on the hospital website and the internal employee portal. Hard copies will be available through Patient Relations. On request, the plan can be made available in alternative formats, such as computer disk in electronic text, in large print or in braille.