



## **ACCESSIBILITY FOR PERSONS WITH DISABILITIES**

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### **Statement of Commitment**

Hospice Wellington strives to provide its services to all individuals in a way that respects the dignity and independence of persons with disabilities. Hospice Wellington is committed to providing an accessible environment for all patients, clients, customers, employees, visitors, job applicants, volunteers, suppliers and contractors. Hospice Wellington is committed to offering equal opportunity to access its products and services and to providing the benefit of the same services, in the same place and in a similar way to all individuals including persons with disabilities.

We strive to provide an accessible and welcoming environment for everyone by identifying and removing barriers in our workplace and ensuring that new barriers are not created. Hospice Wellington ensures that persons with disabilities are provided with equal opportunities. We are committed to meeting the needs of individuals with disabilities in a timely and integrative manner that respects their dignity and independence.

Hospice Wellington is committed to complying with its obligations under the Accessibility for Ontarians with Disabilities Act, 2005 and the Accessibility Standards for Individual Service, Ontario Regulation 429/07.

Hospice Wellington is governed by this policy as well as the Accessibility Standards for Customer Service, Information and Communication, and Employment Policies. As well as the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities.

### **Application**

This policy applies to the provision of services at premises operated by Hospice Wellington. This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Hospice Wellington, including when the provision of services occurs off the premises of Hospice Wellington. This policy shall also apply to all persons who participate in the development of Hospice Wellington's standards, practices and procedures governing the provision of goods and services to members of the public or third parties.

### **Definitions**

**Assistive Device**: A technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that individuals bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.



Accessible Format: Includes but is not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

Communication supports: Captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

Constructive discrimination: Also referred to as adverse effect, is discrimination that unintentionally singles out a particular group, resulting in unequal treatment.

Conversion-ready: An electronic or digital format that facilitates conversion into an acceptable format.

Guide Dog: A highly-trained working dog that has been trained at a specialized facility to provide mobility, safety and increased independence for people who are blind.

Mobility aid: Any manual or electric wheelchair, scooter, boarding chair, walker, cane, crutch, prosthesis, or other aid that is specially designed to assist a person with a disability with a need related to mobility.

Service Animal/Service Dog: an animal is a service animal/service dog for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or if the person provides a letter from a medical practitioner confirming that the person requires the animal for reasons relating to the disability.

Support Person: a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to services.

## **General Principles**

Hospice Wellington will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all individuals receive the same value and quality;
- allowing persons with disabilities to do things in their own ways, at their own pace when accessing services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that persons with disabilities have access to the same services, in the same place and in a similar manner;



- taking into account individual needs when providing services; and
- communicating in a manner that takes into account the individual's disability.

### **Training**

Training will be provided to all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Hospice Wellington, and those who are involved in the development and approval of individual service policies, practices and procedures.

Training will cover instructions on how to interact and communicate with people with various types of disabilities, instructions on how to use equipment or devices that are available at Hospice Wellington's premises or that are provided to help people with disabilities and Hospice Wellington's policies, procedures and practices pertaining to providing accessible individual service to individuals with disabilities.

A copy of this policy will also be posted in the workplace.

### **Accessibility Plan**

Hospice Wellington has developed, documented, and will maintain an accessibility plan outlining the strategy to prevent and remove barriers from our workplace and to improve opportunities for persons with disabilities.

The accessibility plan will be reviewed and updated at least once every 5 years. Upon request, Hospice Wellington will provide a copy of the accessibility plan in an accessible format.



## **Accessible Employment Standard**

Hospice Wellington makes every effort to identify, remove, and prevent barriers to employment by developing inclusive procedures that support and accommodate persons with disabilities throughout their recruitment and employment. Whenever a candidate requires accommodation to enable them to fully participate in the recruitment and selection process, or a current employee requires accommodation in the workplace, the organization works with the individual to provide such accommodation up to the point of undue hardship.

### **Recruitment and Hiring**

#### Recruitment, assessment, or selection process

Hospice Wellington will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests accommodation, Hospice Wellington will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

#### Notice to successful applicants

When making offers of employment, Hospice Wellington will notify the successful applicant of our policies for accommodating employees with disabilities.

#### Informing employees of the support available

Hospice Wellington will continue to inform our employees of our policies (and any updates to policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

#### Accessible formats and communication support for employees

Upon the request of an employee with a disability, Hospice Wellington will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information needed to perform their job and any information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Hospice Wellington will consult with the employee making the request.



## **Training and Development**

Hospice Wellington recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for all employees. To this end, all employees are treated equally regarding training opportunities, and the organization does not discriminate against employees who require accommodation when considering eligibility for training and development.

The organization aligns training and development programs to meet the needs of employees with disabilities and provides training as soon as reasonably practicable upon the person being assigned to applicable duties. Training programs are designed with flexibility to allow customization for the individual requirements of the employee, such as providing training materials in accessible or conversion-ready formats that take into account the needs of the employee. The organization considers employee barriers when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.

## **Emergency Response**

If necessary or upon request, Hospice Wellington creates individualized workplace emergency response plans for employees with disabilities. The emergency response plan considers the unique challenges created by the individual's disability and the physical nature of the workplace and is created in consultation with the employee. If an employee with a disability requires assistance from a support person during an emergency, the organization designates a fellow mutually agreed upon employee to act as such. Where necessary, this employee will have the required first aid training and certification necessary to provide emergency support.

Customized emergency response plans are reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and
- The organization reviews general emergency response policies.

## **Documented individual accommodation plans**

Hospice Wellington will develop individual accommodation plans for employees with disabilities. If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

## **Return to Work**

Hospice Wellington provides a supportive return-to-work program and develops and implements return-to-work processes for employees who are absent from work due to a disability and require accommodation to return to work. The organization works with the employee to develop an individualized return-to-work plan and support the employee in the transition period by identifying



and eliminating or reducing any barriers. The return-to-work process outlines the steps the organization will take to facilitate the employee's return to work and any individualized accommodation needs.

**Inability to Accommodate**

Hospice Wellington provides workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of reasonable accommodation exist, or where the creation of accommodation would create a health and safety hazard or cause unreasonable costs for the organization.

Where a necessary accommodation is found to cause undue hardship on the organization, the organization will work to find a fair and equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.



## **Accessible Customer Service Standard**

Hospice Wellington seeks to provide barrier-free access to the organization's services for all customers, clients and visitors. Where barriers cannot be removed, alternate means for accessing services are provided to the best of the organization's ability.

This standard applies to the provision of goods and services at premises owned and/or operated by Hospice Wellington. It also applies to employees, agents and/or contractors who deal with the public or other third parties that act on behalf of Hospice Wellington, including when the provision of goods and services occurs off the premises.

The section of this standard that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and/or operated by Hospice Wellington.

Hospice Wellington will make every reasonable effort to ensure that its standards, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers, clients and visitors, receive the same value and quality.
- Allowing customers, clients and visitors, with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk.
- Using alternative methods when possible, to ensure that customers, clients and visitors, with disabilities have access to the same services, in the same place and in a similar manner.
- Taking into account individual needs when providing goods and services.
- Communicating in a manner that takes into account the customer's, client's or visitor's disability.

### **Individual's own assistive device(s):**

Persons with disabilities may use their own assistive devices as required when accessing services provided by Hospice Wellington.

### **Guide Dogs, Service Animals and Service Dogs:**

A person with a disability who is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

### **Recognizing a Guide Dog, Service Dog and/or Service Animal:**

If it is not readily apparent that the animal is being used by the individual for reasons relating to his or her disability, Hospice Wellington may request verification from the individual. Verification may include a letter from a Physician or Nurse confirming that the person requires the animal for reasons related to the disability; a valid identification card signed by the Attorney General of Canada; or, a certificate of training from a recognized guide dog or service animal training school.



### Care and Control of the Animal:

The individual who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

### Allergies:

If health and safety concerns present themselves, for example, in the form of a severe allergy to the animal, Hospice Wellington will make all reasonable efforts to meet the needs of all individuals.

### Support Persons and Service Animals

If a customer, client or visitor with a disability is accompanied by a support person, Hospice Wellington ensures that both persons may enter the premises together and that the customer, client, or visitor is not prevented from having access to the support person. A customer, client, or visitor with a disability accompanied by a service animal may access premises that are open to the public unless otherwise excluded by law.

In situations where confidential information might be discussed, consent will be obtained from the individual, prior to any conversation where confidential information might be discussed.

### **Procedures**

It is the procedure for all designated Employees to inquire of all individuals whether or not there are any special needs or requirements they have when they visit the Hospice Wellington's facility. Hospice Wellington will obtain this information in advance of any visit. Where advance notice is not possible, Hospice Wellington will determine any special needs or requirements at the time of arrival.

Designated Employees will have current knowledge of external and internal access points to the building, location of relevant facilities (washrooms), and any assistive devices which may be available on the premises.

Designated Employees will provide individuals with appropriate direction on the use of assistive devices, and upon request, will accompany the individual to the location of the assistive device, and provide assistance in the use of the device.

### **Practices**

In order to meet the needs of each individual, Hospice Wellington will utilize existing available methods, techniques or devices if available and suitable for the individual, or alternatively will adapt or change a current practice or will simply ask the individual what is needed.

Every reasonable effort will be made to accommodate the needs of the individual, short of health and safety concerns which may place the guest or others at risk.





## **Types of Disabilities**

### **Vision**

To ensure effective communication with an individual, Employees are to always ask the individual how they may help them. Employees should offer assistance, but wait for the person to accept it. When guiding, walk slowly, and advise of upcoming obstacles, turns, etc. Employees should describe services. If providing written material, offer to read it. If leaving the individual unattended, Employees are to advise the individual of where they are going and when they will return.

### **Hearing**

There are varying degrees of hearing loss, so to ensure effective communication with an individual, determine what capability they have (e.g. oral deaf people can speak and read lips). Employees should maintain eye contact, avoid covering their mouth with papers, avoid talking while leading the guest, in emergencies, assist the guest in recognizing and responding, use a pen and paper to communicate back and forth if unable to use sign language, and move to a quiet area for discussion when dealing with a person with a hearing aid.

### **Physical Disabilities**

These disabilities come in many forms – confinement to a wheelchair, loss of a limb, and less visible disabilities such as heart or breathing conditions. To ensure effective communication with an individual, Employees are to ask the individual how they can help, pull up a chair and sit with the individual at their level, offer assistance if the individual appears to be struggling or in distress, ask before touching or moving an assistive device and ensure the environment is free of obstacles.

### **Speech or language**

To ensure effective communication with an individual, if an Employee does not understand the individual, the Employee should ask them to repeat themselves. Employees should also ask close-ended questions to elicit a yes/no response, be present when the individual responds, and never interrupt or assume what the individual wants.

### **Mental Disabilities**

An Employee may not be aware of a mental disability when dealing with a guest. These individuals may face barriers such as increased anxiety, sudden mood swings, poor concentration and memory. To ensure effective communication with an individual, Employees should ask how they can help, and work with the individual to find a solution.

### **Intellectual, Learning and Developmental Disabilities**

These disabilities include a range of disorders that affect verbal and non-verbal information acquisition, retention, understanding and processing. To ensure effective communication with an individual, be prepared to explain and provide examples of information, provide information in smaller segments, respond to any requests for assistance in completing forms and allow extra time to complete tasks.



Hospice Wellington will provide access to our premises to both the individual and support person. It is important for Employees to focus attention on the individual, not the support person. If an Employee is unsure of which is the individual, ask. The Employee should introduce themselves to both people and talk directly to the individual, even if the support person is responding. Provide written materials to both the individual and support person and never separate the two. In cases where confidential information is being discussed or provided, consent should be obtained from the individual. Consent can range from written to a gesture from the individual, taking into account their disability.

### **Communication**

Hospice Wellington understands the importance of accessible digital and non-digital forms of communication and does its best to provide accessible types of communication and information to all individuals with disabilities. Such accessible formats and communication supports are provided upon request, in a timely manner and at no additional cost.

Hospice Wellington will develop an approach to communication that is flexible and considerate of all individuals. Designated Employees will understand disabilities and how they may affect communication, will consider alternative approaches to make communication accessible, and will always ask the individual what they need.

### **Service Disruptions**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Hospice Wellington. In the event of any temporary disruptions to facilities or services that persons with disabilities rely on to access or use Hospice Wellington's services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

When disruptions occur, the organization will:

- Post notices at the nearest accessible entrance to the service disruption;
- Update the organization's website with information about the disruption; and
- Contact clients/volunteers with reservations or appointments by any method that may be reasonable under the circumstances.

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known: the services that are disrupted or unavailable, the reason for the disruption, the anticipated duration and a description of alternative services or options.

When disruptions occur, Hospice Wellington will provide notice by posting notices in conspicuous places including at the point of disruption, and at the main entrance, contacting individuals with appointments, verbally notifying individuals when they are making a reservation or appointment; or by any other method that may be reasonable under the circumstances.



The organization makes every reasonable effort to indicate when services will resume and suggest alternatives that can be used during the disruption. In some circumstances, such as in the situation of unplanned temporary disruptions or emergencies, notice may not be possible.

### **Emergency Notifications**

Hospice Wellington provides emergency and public safety information, plans, procedures, maps and warning signs at evacuation points, and any other emergency alert information in accessible formats or with appropriate communication supports, upon request. Alarm systems are both auditory and visual.

The organization will:

- Work with any individuals requesting information to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and
- If a person with a disability requires assistance in an emergency, make sure an employee is available to assist.

### **Building Accessibility**

Hospice Wellington works to ensure that the building environment, including building interiors and exteriors, is designed to facilitate barrier-free access to services, and workplace for employees and volunteers. If areas of the building environment are not accessible for certain individuals with disabilities, the organization will work with the individual to provide an alternate means of access up to the point of undue hardship.

### **Feedback**

Hospice Wellington acknowledges that client and employee/volunteer/visitor feedback can lead to improved service, increased clientele, a reduction in complaints, improved working conditions, and improved workplace culture, especially as it applies to accessibility. Hospice Wellington shall provide individuals with the opportunity to provide feedback on the service provided to persons with disabilities. Information about the feedback process will be readily available to all individuals and notice of the process will be posted at the office and verbally communicated to individuals. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (handwritten, delivered, website or email), will be available upon request.

#### Submitting Feedback:

Individuals can submit feedback to:

Hospice Wellington

795 Scottsdale Drive

Guelph, ON, N1G 3R8

info@hospicewellington.org

Phone: 519-836-3921 ext. 225 Fax: 519-836-2154



Individuals who provide formal feedback receive acknowledgement of their feedback, along with information regarding any resulting actions based on their submitted concerns or complaints.

Feedback can be provided anonymously if desired, and feedback remains confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. The personal information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.



## **Accessible Information and Communication Standard**

Hospice Wellington will continue to ensure that our process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.

Hospice Wellington shall provide customers, clients and visitors with the opportunity to provide feedback on the service provided to people with disabilities.

Customers, clients and visitors who provide feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

### **Accessible formats and communication support**

Upon request, Hospice Wellington will provide or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

Hospice Wellington will consult with the person making the request to determine the suitability of an accessible format or communication support.

Hospice Wellington will also notify the public about the availability of accessible formats and communication supports.

### **Accessible websites and web content**

Hospice Wellington is continually working to improve our website and web content and aims for our website and web content to be World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA compliant.

### **Responsibility**

Annual review and responsibility by Executive Director.

Signature   
Pat Stuart,  
Executive Director, Hospice Wellington

Date: November 23, 2024

Date of Review: September 2025