



# THE MIDDLESEX HOSPITAL ALLIANCE

Strathroy Middlesex General Hospital and Four Counties Health Services

## Multi-Year Accessibility Plan

November 2018 – October 2021

***Submitted to***

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This publication is available on the following website:

[www.mhalliance.on.ca](http://www.mhalliance.on.ca)

and will be made available in alternative formats upon request

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## Background and Summary

The purpose of the Ontarians with Disabilities Act, 2001 (ODA) is to improve opportunities for people with disabilities and to provide for their involvement in the identification, removal and prevention of barriers to their full participation in the life of the province. To this end, the ODA requires each organization to prepare an annual accessibility plan; to consult with persons with disabilities in the preparation of this plan; and to make the plan public.

With the introduction of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the subsequent Integrated Accessibility Standard Regulations (O. Reg. 197/11); the requirement to create, maintain and communicate a multi-year accessibility plan replaced the annual plan requirement. This document is the multi- year accessibility plan for the Middlesex Hospital Alliance (hereinafter referred to as “MHA”). The plan builds on previous years plans and includes measures that the MHA will take in the upcoming years to identify, remove and prevent barriers to people with disabilities who live, work in or use the facilities and services of the MHA. The Plan will be reviewed annually and updated as barriers are identified and/ or eliminated.

At the MHA we are committed to improving access to our facilities, services and care for patients, their families, visitors, staff and volunteers.

MHA is committed to:

- the continual improvement of access to hospital facilities, policies, programs, practices and services for patients, their family members, staff and volunteers
- the participation of persons with disabilities in the development and review of its annual plan
- the provision of quality services to all patients, their family members, and members of the community with disabilities



## **Middlesex Hospital Alliance**

The Middlesex Hospital Alliance (MHA) is comprised of two partner sites, Strathroy Middlesex General Hospital (SMGH) and Four Counties Health Services (FCHS) with a combined operating budget of \$50M. The hospitals serve approximately 78,000 residents in Middlesex, Lambton, Elgin and Kent Counties. SMGH operates 54 beds and is a full service family-centred community hospital providing 24/7 emergency care and a comprehensive range of diagnostic and ambulatory services, surgical services and Obstetrics, as well as both primary and secondary care. FCHS operates 12 beds and is a primary care facility providing 24/7 emergency care, diagnostic services, inpatient acute care as well as ambulatory and physiotherapy clinics. Within our Middlesex Hospital Alliance family, over 675 physicians and specialists, employees and volunteers care for the patients in our communities.

### **Our Mission**

To provide the healthcare we would expect for our own families

### **Our Vision**

Exceptional Care by Exceptional People

### **Strategic Pillars**

- Quality Care – unparalleled focus on quality
- People – Attract, Retain and Support the Best
- Relationships – Optimize and Leverage Partnership Opportunities
- Resources – Utilize our Resources in an Effective and Efficient Manner
- Innovation – Challenging the Status Quo



## Introduction to Plan

The Ontario government's goal is a fully accessible Ontario by 2025. In 2001, the Ontarians with Disabilities Act (ODA) was passed. This was followed in 2005 by the Accessibility for Ontarians with Disabilities Act (AODA), and in 2008 with the Accessibility Standard for Customer Service, Ontario Regulation 429/07. The Integrated Accessibility Standards, Ontario Regulation 191/11 is the latest standard issued under the AODA 2005 and became law on June 3, 2011. It covers accessibility standards in information and communication, employment, transportation and the design of public spaces. There is a phased-in approach to compliance, with deadline dates for each standard being based upon organization type and size, primarily ranging between January 1, 2012 and January 1, 2017. By January 1, 2021, all websites and their content are to be fully accessible.

The preceding Ontarians with Disabilities Act, (ODA 2001) remains in force until retracted. The purpose of this Act is to "Improve opportunities for people with disabilities and to provide for their involvement in the identification, removal and prevention of barriers to their full participation in the life of the province." This Act mandates hospitals and other identified public sector organizations to write, approve, endorse, submit, publish, and communicate their accessibility plans. The Middlesex Hospital Alliance (Four Counties Health Services) and (Strathroy Middlesex General Hospital) is committed to providing an environment free of barriers for people with a disability.

A "Barrier" is defined as:

- a) 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, a policy or a practice.

A Disability is defined as:

- a) Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect



or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device

- b) A condition of developmental disability or mental impairment
- c) A learning disability or a dysfunction in one or more of the processes involved in understanding or using spoken language or symbols
- d) An injury or disability for which benefits were claimed and received under the insurance plan established under the Workplace Safety and Insurance Act, or
- e) A Mental Disorder

The MHA has undertaken projects throughout the years to enhance the accessibility of the hospital, and its services. The sites of the MHA will continue to do so with the goal of eliminating any barriers to access, communication and service for those with disabilities.



## Requirements under the AODA 429/07 Customer Service Regulation

The Act requires that we:

- 1) Implement policies, practices and procedures on providing goods and services to people with disabilities
- 2) Execute a policy on allowing people to use their own personal assistive devices to access goods and services, and provide information about any other means offered by the hospital (assistive devices, services etc.) to allow them access to goods and services
- 3) Ensure hospital policies, practices and procedures are in line with the core principles of independence, dignity, integration and equality of opportunity
- 4) Communicate with a person having a disability in a manner that takes into account his or her disability
- 5) Train staff, volunteers, contractors and other people that interact with the public or other third parties on the hospital's behalf on the topics outlined in the customer services standard, and record all training including the dates the training occurred and names of the individuals trained
- 6) Train staff and any other people involved in developing hospital policies, practices and procedures on the requirements regarding goods or services as outlined in the customer service standard
- 7) Allow people with disabilities to be accompanied by their guide dog, service animal or support person in areas of the premises unless the animal or person is restricted for health reasons, or by law



- 8) Provide information on any admission fees that may be charged for a support person, with as much advance notice as possible
- 9) Provide notice when services, goods, or facilities used by people with disabilities are temporarily disrupted
- 10) Establish a process for people to provide feedback on the hospital's method of providing goods and services to people with disabilities and how you will respond to any feedback, and take action on any complaints, ensuring information about how the hospital will provide feedback should be readily available to the public
- 11) All policies, practices and procedures that govern accessible customer service and associated requirements must be documented
- 12) Provide notice to customers that documents required under the customer service standard are available upon request
- 13) Ensure the documents required under the customer service standards are available when requested, by a person with a disability, in a format that takes into account the person's disability





## **Accessibility at the Middlesex Hospital Alliance**

Accessibility Planning was initially the responsibility of the Joint Occupational Health and Safety/Environment Team at each individual site. In October 2012, this responsibility moved to the MHA Facilities Management Department in consultation with senior leadership. A working group was established to ensure the involvement of staff and persons with disabilities in the review of this accessibility plan moving forward. In 2015, the responsibility of Accessibility Planning transitioned to the Occupational Therapist/Improvement Facilitator with continued consultation with Senior Leadership and the working group.

Staff, volunteers, third party contracts, and physicians have received training on the accessibility standards and have reviewed the corresponding policies as part of our plan to enhance accessibility to customer services at the MHA.

The accessibility working group is dedicated to identifying, removing and preventing barriers to people with disabilities. Furthermore, the physical environment is an area of focus that is part of our Senior Friendly Care strategy. The accessibility plan is available on the Middlesex Hospital Alliance Corporate Website, and in hard copy including a large print version, upon request.

## **Identification of barriers**

We believe that it is the responsibility of all staff to be on the alert for barriers within the organization, and to bring the existence of the barrier to the attention of Administration and the Accessibility Working Group. To facilitate this, staff, volunteers and physicians are encouraged to report potential barriers and a possible solution if known. As well, in keeping with Accreditation standards of Patient/family engagement, we encourage our patients to identify any barriers.



## Integrated Accessibility Standards Compliance Plan

IASR Requirement	Status	Timing
<b>General</b>		
Create accessibility policies that demonstrate the organization's commitment to becoming more accessible	Compliant	Policy to be reviewed every 3 years as per MHA policy review
Create a multi-year accessibility plan that outlines what you will do to remove and prevent barriers in your organization	Compliant	Plan to be reviewed annually and updated as required.  A status report will be completed by the working group and provided to SLC in with changes
Post the multi-year accessibility plan on the organization's website	Compliant	3 year cycle – next review 2021
Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.	Compliant	Complete
Incorporate accessibility features in the design, procurement and acquisition of self-serve kiosks	Parking Kiosks (not owned by MHA) have been reviewed. Consideration will be made for other kiosks as indicated.	Complete



Ensure training is provided on the requirements of the accessibility standards referred to in the IASR and in the Human Rights Code as it pertains to persons with disabilities to employees, volunteers, persons developing the organization's policies and others who provide goods or care on behalf of the organization	Training program exists for staff, Physicians, volunteers, clergy, auxiliary members and leadership.	Training updated in 2012 Training is issued to new hires and students through Learning Management System
<b>Information and Communication Standards</b>		
Have process for receiving and responding to feedback and ensure the process is accessible	Currently RL Solutions is utilized for feedback.	Complete
Upon request, provide or arrange the provision of accessible formats and communication supports for persons with disabilities	Some methods are accessible and support currently available. Notice of this service will be posted on the website when updated	Complete
If an organization makes emergency procedures, plans or public safety information available to the public it is required to be in accessible formats or with communication supports	Emergency information is not currently made public however patients and visitors are informed of emergency procedures as needed	Complete
New internet and intranet websites and web content must conform to WCAG 2.0 Level AA, other than captions and audio descriptions	Beginning in January 2019, funding available to begin upgrade. Initial discussion with contracted companies confirms standards will be met	To be compliant by January 2021
All internet websites and web content must conform to WCAG 2.0 Level AA other than captions and audio descriptions	As above	As above



<b>Employment Standards</b>		
Notify employees and members of the public of the availability of accommodation for applicants with disabilities in our recruitment processes	Compliant - Accommodation noted on job posting page	Complete
Notify applicants when they are selected to participate in assessments or selection processes that accommodations are available upon request in relation to the processes or materials being used	Compliant - Individuals coming for interview are asked if they require accommodation	Complete
Applicants are notified of policies accommodating employees with disabilities	Compliant - Postings indicate that accommodation is available for applicants with disabilities. There is a statement on the recruitment page a statement	Complete
Inform employees of policies used to support employees with disabilities including provision of job accommodations that take into account accessibility needs due to disabilities	Compliant	Complete
Provide information required under this section to new employees as soon as practicable after they begin their employment	Compliant - New employees receive AODA training and review the policies through e - learning upon commencement of employment	Complete
Provide updates to employees when there is a change to existing policies on the provision of job accommodations	Compliant - This would be done when required	Complete



<p>Upon request by an employee, provide or arrange for the provision of accessible formats and for communication supports for:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Information that is needed to perform the employee's job</li> <li><input type="checkbox"/> Information that is generally available to employees in the workplace</li> </ul> <p>The employer consults with the employee making the request to determine the accessible format or communication support required</p>	Compliant	Complete
<p>Provide individualized workplace emergency response information to employees with disabilities, if the disability is such that the information is necessary, and the employer is aware of the need of accommodation due to the employee's disability</p>	Compliant	Complete
<p>Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities</p>	Compliant	Complete
<p>Develop and document 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</p>	Compliant	Complete



Performance management shall take into account the accessibility needs of employees with disabilities, as well as accommodation plans	Compliant	Complete
Employers that provide career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as individual accommodation plans	Compliant	Complete
Redeployment shall take into account the accessibility needs of employees with disabilities as well as accommodation plans	Compliant	Complete
<b>Transportation Standards</b>		
Organizations that are not primarily in the business of transportation, but that provide transportation services shall provide accessible vehicles or equivalent services upon request	Transportation provider provides accessible service. This is a contracted service	
<b>Design of Public Spaces</b>		
Ensure that new and redeveloped exterior paths of travel follow technical requirements as set out in the standard	Complete – ie front entrances accessible as are ED entrances	Complete



<p>Ensure that when building or making major changes to existing outdoor public eating areas at least 20%, and no fewer than 1, of the tables are accessible to people using mobility aids, that the ground leading to and under the accessible tables is level firm and stable and that, enough space is clear around the accessible tables so people using a mobility aid can approach the tables</p>	<p>Ongoing review</p>	<p>Will be considered with any modification after 01/16</p>
<p>Ensure that new or redeveloped parking spaces are created according to the technical requirements as set out in the standard</p>	<p>Compliant</p>	<p>Complete</p>
<p>When making changes to or adding new service counters ensure that at least one service counter is accessible to people who use mobility aids as per the technical requirements set out in the standard</p>	<p>Ongoing review</p>	<p>Will be considered with any modification after 01/16</p>
<p>When building or making changes to queuing guides ensure that the queuing area is wide enough for people using a mobility aid and people with vision loss can detect the queuing area with a cane</p>	<p>Ongoing review</p>	<p>Will be considered with any modification after 01/16</p>
<p>When constructing or make major changes to waiting areas ensure that 3% of the seating is accessible and that no fewer than 1 seating space is accessible</p>	<p>Ongoing review</p>	<p>Will be considered with any modification after 01/16</p>
<p>Ensure that the accessibility plan contains preventive and emergency procedures for accessible parts of public spaces, such as posting when regular maintenance occurs and letting people know about alternatives</p>	<p>Compliant</p>	<p>Complete</p>



Ensure that procedures for handling temporary disruptions in service when an accessible part of your public spaces stops working, such as putting up a sign explaining the disruption and outlining an alternative	Compliant Policy review 2018	Complete
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### Achievements in Accessibility

Barrier	Objective	Strategy	Performance Criteria	Responsibility
Grab Bars	To improve better positioning and fit of current grab bars	Assess and properly size and position replacement grab bars	October 2015. No issues noted in current accessible washroom areas	Facilities Management
SMGH - Redevelopment of front entrance	To improve access for persons with mobility challenges	Improved grade to entrance area and added radiant heating to concrete to prevent slippery surfaces	Completed 2015 Parking pay stations are indoors to facilitate access/use by persons with disability.	Facilities Management



<b>Barrier</b>	<b>Objective</b>	<b>Strategy</b>	<b>Performance Criteria</b>	<b>Responsibility</b>
Improved lighting at entrances	To increase lighting levels	Installed LED wall mounted lighting at all entrances &	building improvements to lighting with installation of LED FCHS – 2016 SMGH - 2018	Facilities Management
SMGH - Access to wheelchairs	To ensure wheelchairs are available as required for persons with mobility challenges	Process to ensure wheelchairs are identified and available as required	Completed – 2012  Regular audits are completed to ensure chair maintenance and access.	Rehab Department
Review of Draft Integrated Accessibility Standard	Develop understanding of draft currently out for review	Ensure future planning / projects include review of 191/11 as part of design process	Completed 2012	Facilities Management
SMGH - Improve access to Facilities Management for persons with disabilities	To ensure customers entering the department are not subject to barriers	Renovated existing area ensuring pathways and office spaces were sized to accommodate persons in wheel chairs	Completed 2012	Facilities Management
Leadership for AODA sustainability	Ensure facilities are continually reviewing and addressing accessibility concerns	Responsibility for leadership and compliance with AODA act and regulations	Completed – 2012 Transitioned to Occupational Therapist/Improvement Facilitator in 2015	Occupational Therapist/Improvement Facilitator



<b>Barrier</b>	<b>Objective</b>	<b>Strategy</b>	<b>Performance Criteria</b>	<b>Responsibility</b>
SMGH - Installation of automatic door operator for barrier free washroom in lobby area	To improve ease of access to barrier free washroom	Automate operator	Completed 2015	Facilities Management
SMGH - Newly redeveloped front entrance nontraditional door layout creates barrier for visually impaired	To create easily identifiable pathway through entrance	Installed directional marking tape in vestibule to indicate pathway.	Completed 2013	Facilities Management
SMGH - Installation of accessible entrance signage that had been removed during renovations	To identify which entrances are accessible	Install appropriate signage	Completed 2016	Facilities Management
Involvement from peoples with disabilities in the review and development of policies /procedures annually	Ensure that disabled community members have input to policies / procedures	Patient/Family engagement	Beginning 2015 - Moving forward with patient and family input as part of improvement projects as per QIP, Accreditation standards & Senior Friendly Care Strategy	Facilities Management VP Clinical Services/CNE
SMGH - Hand rails for main corridor to Ambulatory Care and Diagnostics Imaging	Railings to aid persons with mobility issues	Installed railings	Completed 2013	Facilities Management



<b>Barrier</b>	<b>Objective</b>	<b>Strategy</b>	<b>Performance Criteria</b>	<b>Responsibility</b>
FCCHS - Create barrier free washroom in Adult Day Centre at Four Counties Health Services	Provide accessible facilities for adult day program participants	Renovate and repurpose space to create new accessible washroom	Completed 2014	Facilities Management
SMGH - Barrier Free Pathway to Fountain	Create an accessible pathway and sitting area	Design pathway, gardens, seating area etc. to create gathering space	Completed 2014	Facilities Management / SMGH Auxiliary
Parking services Kiosk (not owned by MHA)	Ensure that parking services Kiosk is accessible		Kiosks have been moved to front lobby. Parking services indicates kiosks are accessible	Foundation / Parking Services Vendor
FCCHS - Improved Fire Alarm signaling devices	Replace or augment fire alarm bells with strobe devices for persons with hearing impairments	Review current system, engineer solution and install	Completed 2014	Facilities Management
SMGH Barrier Free washroom in Diagnostic Imaging Department	Provide accessible bathroom for DI patients and families	Washroom renovated during DI upgrades	Completed 2018	Facilities Management DI department



## Future accessibility opportunities for the Middlesex Hospital Alliance

Barrier	Objective	Strategy	Performance Criteria	Responsibility
FCHS - Installation of automatic door operators for barrier free washroom in emergency department lobby area	Improve ease of access		Current washroom has been reviewed. Not currently feasible for modification. Will be included in any future renovations	Facilities Management
SMGH – Technology updates needs to ensure patients personal devices can access WI-FI	Patient/family have access to technological supports are necessary	MHA Wi-Fi compatible so patients can bring their own devices	WI –FI 2015 Improved network access	Facilities Management / Information Systems and Telecommunications
SMGH - Voice annunciation for passenger elevators	Aide visually impaired persons with elevator operation	Upgrade elevator controls to include voice annunciation	To be implemented with replacement of Elevators at their end of useful life. Estimated 2020 dependent on funding.	Facilities Management
SMGH - Improved access to front entrance (handrails)	Railing to aid persons with mobility issues	Install a hand rail towards the sidewalk	Handrails are installed where possible. Not able to install directly in front of main entrance due to radiant heat in cement pad	Facilities Management

Barrier	Objective	Strategy	Performance Criteria	Responsibility
Patient registration kiosks	Improve access for patients and visitors	Install fully accessible kiosks for self registration	Consideration of accessible registration kiosks if modifications made and dependent on funding.	Materials Management / Information Systems and Telecommunications
MHA Intranet site not currently in accessible format	Prepare for a fully accessible internal website(intranet)	Review of current intranet site to determine gaps to compliance with WCAG 2.0 Level AA	Intranet/Internet site to be compliant by January 1, 2021	Information Systems and Telecommunications
MHA external website requires upgrades	Prepare for a fully accessible external website(internet)	Review of current website to determine steps to ensure that it will be compliant with WCAG 2.0 Level AA	Intranet/Internet site to be compliant by January 1, 2021	Information Systems and Telecommunications
SMGH - Relocate Info desk or redesign front lobby	Improve visibility & accessibility of info desk for all patients and families	Explore redesign, colour options, location	2018 – in design phase. Will be fully accessible once complete	Facilities Management



Barrier	Objective	Strategy	Performance Criteria	Responsibility
Lack of equipment specifically for bariatric patients	Provide necessary equipment to meet the needs of this population	Investigate best equipment options and strategies to best practice care for bariatric patients	Webinar through University of Waterloo "Bariatric Friendly Hospital Initiatives" – 2018  Purchase of bariatric beds, walkers 2018 ongoing	Patient Care Managers Team



## Communication of the Accessibility Plan

The MHA accessibility plan is posted for our patients/families and community on the MHA web site ([www.mhalliance.on.ca](http://www.mhalliance.on.ca)). Copies are available from the Administrative offices at both SMGH and FCHS. On request, the report can be available in alternate formats.

The plan is posted for staff on the MHA Intranet – The Insider.

### MHA AODA Committee Members:

Laurie McGill (Chair) Occupational Therapist  
Alasdair Smith VP Finance & Chief Financial Officer  
Ryan Whitney Manager Facilities & Maintenance Service  
Jeff Brock Manager Information Services & Technology  
Bianca Maselli Health & Safety Officer

