

Accessibility - Customer Service Regulation and Animal Service

POLICY

Southlake Regional Health Centre (Southlake) commits to providing barrier free access to its environments, programs, and services.

Based on the requirements within the Accessibility for Ontarians with Disabilities Act (AODA), 2005, Southlake ensures compliance with this Customer Service Regulation. Elements of the Customer Service Standard include policies or procedures addressing but not limited to:

- Training and Education
- Assistive Devices
- Service Animals
- Notice of Service Interruption
- Support Persons

DEFINITIONS

- **Barrier** – As defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. It includes a physical barrier, an architectural barrier, an informational or communications barrier, an attitudinal barrier...a policy or a practice barrier.
- **Disability** – Disability refers to all disabilities protected in the Human Rights Code, R.S.O. 1990, Ch.H.19, as defined in sec.10 of the Code as follows:
 - 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, including diabetes mellitus, epilepsy, and degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or on a wheelchair or other remedial appliance or device,
 - a condition of mental retardation or impairment,
 - a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - a mental disorder, or
 - an injury or disability for which benefits were claimed or received under the Workplace Safety and Insurance Act."
- **Service animal** – Defined under Section 4(9) of the Accessibility Standards for Customer Service, O. Reg. 429/07, as follows:
 - "an animal is a service animal 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 physician or nurse practitioner confirming that the person requires the animal for reasons relating to the disability".
- **Staff** - Includes Southlake employees, medical staff, volunteers, students and all others who have a working relationship with the hospital to provide services.
- **Support person** – Defined under Section 4(8) Accessibility Standards for Customer Service, O. Reg. 429/07, as follows: "a support person means, in relation to a person with a disability, another person who accompanies their in order to help with communication, mobility, personal care or medical needs or with access to goods or services."

Training and Education:

Education and training (as appropriate) regarding accessibility to services for individuals with disabilities is provided to all employees, students, volunteers, and physicians during orientation. A component regarding accessibility is included in the core curriculum to be completed annually.

Others service providers (e.g. contractors) who are not required to attend hospital orientation receive training and education from the department at Southlake employing their services. Such education shall be provided by the supervisor at Southlake who is overseeing the work of the service provider.

Assistive Devices:

Southlake supports the use of personal assistive devices for individuals with disabilities. An assistive device is defined as any device which allows persons with disabilities to obtain, use, or benefit from the provider's goods or services. Assistive devices are usually devices that people bring with them but may also include equipment available within the hospital for inpatient and outpatient use (e.g. hospital wheelchair).

Wherever possible, persons are permitted unlimited access to their assistive devices. Where the assistive device is not permitted (e.g. cell phone use in restricted areas), provisions are made to provide the service provided by the device.

Facility Operations ensures the good working order of all hospital-owned assistive devices. Staff are to contact Facility Operations or Environmental Services if they identify any hospital-owned assistive devices requiring repair or cleaning.

Assistive Devices include but are not limited to:

- Physical assistive devices - cane, walker, wheelchair, electric scooters, grasping devices
- Communicative Devices - interpreters, hearing devices, laptop computers, personal data assistant (PDA), cell phones
- Visual Aids - magnification devices, Braille devices, white canes, glasses
- Medical Assistive Devices - personal oxygen tanks

Service Animals:

The AODA designates an animal as a service animal if:

1. It is readily apparent that the animal is used by the person for reasons relating to their disability; or
2. If the person provides a letter from a physician confirming that the person requires the animal for reasons relating to the disability.

Examples of service animals include:

- A guide animal, trained by authorized vendors to service for mobility, or individuals with vision loss, blindness or partial sight.
- A hearing animal, trained to alert a person with significant hearing loss or who is deaf when a sound occurs, such as a knock on the door or fire alarm.
- Special skills animals, trained to assist a person who has a mobility or health disability. Duties may include carrying, fetching, opening doors, ringing doorbells, activating elevator buttons, steadying a person while walking, helping a person up after a fall, emotional support, etc. Service animals sometimes are called assistance animals.
- A seizure response animal, trained to assist a person with a seizure disorder. The animal's service depends on the person's needs. The animal may go for help, or may stand guard over the person during a seizure. Some animals have learned to predict a seizure and warn the person.
- A companion animal or emotional support animal that assists persons with psychological disabilities. Emotional support animals can help alleviate symptoms such as depression, anxiety, stress and difficulties regarding social interactions, allowing individuals to live independently and fully use and enjoy their living environment.

Responsibility

Owner of Service Animal

- a. Make the animal clearly identifiable/recognizable as a service animal (e.g., identification card, harness).
- b. The service animal is to remain with the owner at all times. The owner is responsible for the animal's control and stewardship, i.e., the animal's behavior, care, supervision and wellbeing. If the patient is unable to manage the service animal, their designated support person for the animal is to be notified to come to Southlake and assume responsibility for the animal during the transition period.
- c. Make available up-to-date immunization records, if requested.

Area Charge Person

- a. Inform staff about the role of the service animal and how to interact appropriately with the patient and the animal.
- b. If necessary, notify other patients of the service animal's presence and address any concerns (e.g., allergies).
- c. Discuss with the owner and staff the responsibilities for feeding, handling and cleaning issues.

Staff

- a. If uncomfortable providing care to a patient with a service animal, find an alternative professional who will provide that care and document this in the patient's health record.
- b. Not to separate or attempt to separate a patient from their service animal without the owner's consent.
- c. Not to feed a service animal as it may have specific dietary requirements or may become ill from unusual food or food at an unexpected time.
- d. Not to deliberately startle a service animal.

NOTE: If Southlake personnel volunteer to assist the patient to care for the service animal during their off-duty hours, they do so at their own risk and liability. This excludes responsibilities that are delegated by their supervisor in emergencies.

METHOD

Inpatients/Outpatients/Visitors

Patients with disabilities are requested to inform hospital staff as early in the pre-admit process as possible of the need for their service animal to stay with them in hospital.

In planning for a hospital admission/visit, staff must consider the following:

- The wellbeing of the patient.
- The wellbeing of the service animal.
- The patient's and service animal's previous experience with hospitals.
- The anticipated length of stay.
- Implications for patients sharing space in the vicinity.
- Implications for staff/physicians/volunteers.

The requirements surrounding the admission/visit of a patient with a service animal will be assessed individually. The service animal will be allowed to remain with the patient provided the following provisions have been made

- There are no Risk Management reasons that will preclude the service animal's presence.

- The patient should assume full responsibility for the care and behavior of the service animal at all times. The patient may delegate this responsibility to designated support person if necessary.
- Service animals may be permitted a short visit to their owner in an Intensive Care Unit.
- If the patient requests their service animal remain with them overnight, designated support person, who the service animal knows well, must remain overnight and assume full responsibility for the service animal on behalf of the patient.
- At no time will hospital staff assume responsibility for meeting the service animal's needs for exercise, nutrition, elimination, etc.
- Nursing staff are required to notify support departments (e.g. Patient Transport, Medical Imaging) in advance when a patient will be accompanied by a service animal.
- Ideally the patient will be placed in a private room. If there is no private room available, nursing staff must ensure that there are no circumstances that would adversely influence the wellbeing of the patient's roommates. For example, allergies, cynophobia (fear of dogs), or some other unacceptable level of risk.

Eviction or exclusion of a service animal can only occur for reasons that are demonstrable, not speculative. Assumptions or speculation about how the animal is likely to behave based on past experience with other animals are not valid. If another person complains about the presence of a service animal (because of allergies, fear, or other reasons not related to the animal's demeanor or health), the person with objections to the animal should be separated and/or leave the area where the animal is located. Each situation is to be considered individually and in consultation with the owner. Discussion with Risk Management is recommended in difficult situations.

Below are scenarios involving eviction or exclusion at Southlake:

A service animal may be evicted, excluded or separated from its owner only:

- if the animal's actual behavior or health poses a direct threat to the health or safety of others, and/or
- if contraindicated by the attending physician for sound medical and/or safety reasons.

If a patient must be separated from their service animal while in the hospital:

- Staff will identify for the patient what arrangements have been made for supervision or care of the animal during this period of separation; and
- Staff will make appropriate arrangements to address the patient's disability support needs in the absence of the service animal.
- In cases where the presence of the service animal is denied, provisions must be made by Southlake to provide the support generally provided by the service animal to enable the owner access to services/goods. Staff will engage the patient, explain why the support animal presence is denied and establish what other supports need to be provided in place of the service animal.

Service animals are accommodated at Southlake and are permitted in areas commonly accessed by the public such as retail and restaurant services. 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.
- Patient on additional precaution or having an AGMP
- Restricted access areas such as procedure and treatment rooms.

Owners must make arrangements in advance for alternate care of the animal if they plan to enter an area that precludes animals.

Adverse Events

Below are events that may occur at Southlake as well as how to address them:

Where the owner cannot care for the service animal:

- Staff will contact Security, or in areas where Security is not available the Manager/designate, to arrange for temporary appropriate care of the service animal. This could include a temporary space and water.
- Manager/designate will determine who will contact the next of kin or support person to come to the hospital and assume responsibility for the animal.
- The service animal will be brought to the hospital to visit and to resume its duty as soon as possible.

If the animal soils the environment:

- It is the responsibility of the owner to do the cleaning. In a case where the owner is unable to do so, or cannot do so effectively, environmental services will be contacted to clean and disinfect the area.

Service animal bites and/or non bite incidents such as scratches

Requires reporting to the Public Health Inspector at York Region Public Health **1-800-361-5653** and:

- **Patient-** require that the most responsible physician must be notified and a SafePoint incident report must be completed.
- **Visitors-** require that staff escort or direct the visitor to go to the Emergency Department to seek immediate medical aid if necessary. Notify the direct supervisor for the area where the incident occurred and complete a SafePoint incident report.
- **Staff-** require that the staff member go to Occupational Health, Safety and Wellness for minor medical aid during regular business hours or to the Emergency Department to seek immediate medical aid if necessary. Notify their direct supervisor of the incident and complete a SafePoint incident report.

Special Considerations

Staff should be aware of the following while caring for a patient who is accompanied by a service animal:

- Allow a service animal to accompany the patient at all times and everywhere on the property except where animals are specifically excluded (refer to Method).
- Do not pet or touch a service animal. Petting a working service animal distracts the animal from the task at hand.
- Do not feed a service animal. The service animal may have specific dietary requirements.
- Do not deliberately startle a service animal. Avoid making noises at the animal (barking, whistling, etc.)
- Do not separate or attempt to physically separate a patient from their service animal unless you have the owner's permission.
- Converse with the owner, not the animal.
- Avoid eye contact with the animal.
- Avoid initiating conversation about the service animal or the patient's disabilities.
- Remember, not all disabilities are visible. The nature of the person's disability is a private matter, and you are not entitled to inquire for details.
- Service animals may wear specialized identifiable harnesses and vests but this is not a requirement.

Allergies And Phobias

If there is a service animal in an area and a staff/volunteer/patient/visitor identifies an allergy or phobia:

1. Try to physically separate the person from the service animal in the care environment.
2. In the case of a staff member allergy/phobia, consider temporary reassignment of the staff member (decision to be made by the direct supervisor of staff member).
3. The service animal may be declined based on the decision of the manager or designate responsible for the area where the service animal is located. In cases where the animal is declined, provisions must be made to provide the support generally provided by the animal (as specified by the owner).

Notice of Service Interruptions:

Service Interruption notifications are provided by Southlake as per Regulation 429/07 which deems that, "if, in order to obtain, use or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the provider and if there is a temporary disruption in those facilities or services in whole or in part, the providers shall give notice of the disruption to the public." Notifications must include:

- Reason for and information about the disruption.
- Anticipated duration.
- Alternative services or facilities/routes, if available.
- Contact name and number for information relating to the service interruption.

Support Persons:

Southlake recognizes that support persons may be utilized by individuals with disabilities to facilitate their access to goods or services at Southlake. The support person does not need to have special training or qualifications.

A support person is defined as "a person who accompanies a person with disabilities in order to help with communication, mobility, personal care, medical needs or access to goods or services. A support person may be a paid support worker, a volunteer, a friend, or a family member. A support person may be identified as such by the person with the disability and is not required to carry or produce documentation."

Wherever possible, a support person is allowed unlimited access to the person with the disability.

When a support person is permitted access to an area where exposure to confidential information of other patients may be more likely to occur, measures must be taken by staff in that area to ensure such exposure is minimized. Areas where confidential information may be more visible include, but are not limited to, controlled access areas such as surgical suites, procedure rooms, PACU, and recovery rooms. Where possible, prior to the arrival in areas where exposure of confidential information may be more likely to occur, the support person will be asked by staff to sign a [Confidentiality Agreement for Patient Escorts Accessing a Controlled Access Area \(form #SL0638\) in accordance with Southlake's Confidentiality policy \(Special Visitors section\).](#)

References:

- [Accessibility for Ontarians with Disabilities Act \(AODA\)](#).
- <https://www.ontario.ca/laws/regulation/110191>.
- [Ontario Human Rights Code \(OHRC\)](#).