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**The Canadian Hearing Society’s Profile**

Founded in 1940, The Canadian Hearing Society (CHS) is the leading provider of services, products, and information that remove barriers to communication, advance hearing health, and promote equity for people who are culturally Deaf, oral deaf, deafened and hard of hearing.

CHS is governed by a board of directors, the majority of whom who are culturally Deaf, oral deaf, deafened and hard of hearing. The organization’s community and health services are funded by government (both Province of Ontario and the Government of Canada), internal revenue generation including fundraising, and the United Way.

Unique in North America, CHS offers an integrated roster of essential services through 28 offices in Ontario, including:

* Audiology;
* Hearing aid fitting and dispensing;
* Sign language interpreting;
* Hearing care counselling (seniors outreach);
* CONNECT counselling (mental health and addiction counselling);
* One-on-one language development for Deaf and hard of hearing children using play as the medium of learning;
* Employment services;
* General Support Services (general counselling);
* Literacy and basic skills development;
* Sign language instruction;
* Speech-language pathology;
* Speech reading training; and,
* The most complete range of communication devices that assist and augment communication including TTYs (text telephones), amplifiers, visual smoke detectors, baby monitors and alarm clocks.

We also regularly engage on accessibility and human rights issues by supporting individuals in ensuring necessary accommodations are provided; working with governments to advance shared goals; and advocating for broad-based access in all parts of society, including the right to American Sign Language (ASL) and Langue des signes québécoise (LSQ).

With our 73 years of experience and expertise, our connection to communities we serve, and the accessibility that is part of everything we do, we are proud to see our consumers meet their goals. For example:

* Hard of hearing seniors are able to remain longer in their homes when visual devices (alerting them to the phone, doorbell, and fire alarm) enable them to be safe and independent.
* Culturally Deaf, oral deaf, deafened and hard of hearing job seekers—who experience incredible systemic barriers in employment-find work and receive the workplace accommodations that ensure they retain that work.
* Newcomers with hearing loss navigate the immigration, healthcare, educational, and housing systems to settle their families successfully and productively.
* Deaf people can access medical and legal systems with the provision of interpreting services
* And those mental health issues find an environment where—finally—they are among their peers; people who understand the challenges they have faced and can use their own language to get the right diagnosis and move to successful management of their illness.

Lives are changed—and sometimes saved—through the work we do.

**Introduction**

The Canadian Hearing Society (CHS) is pleased to have the opportunity to provide feedback on the proposed changes to the Ontario Building Code (OBC) as it aligns itself with the objectives of the Accessibility for Ontarians with Disabilities Act (AODA) which includes barrier free inclusion for all Ontario residents. Hearing loss can have a major impact on safety, mental health, quality of life, social isolation finances, family relationships, and the ability to communicate with neighbours and service providers.

Culturally deaf oral deaf deafened and hard of hearing and older adults over the age of 65 represents one of the highest risk groups in Canada in the case of detecting a fire alarm or an emergency situation. The aging population is the fastest growing segment in Canada and hearing loss is prevalent within a large segment of this population.

According to Statistics Canada in 2001, there were 1.47 million Ontarians over age 65 with hearing loss; by 2026 that number will rise to 2.9 million—a 100 percent increase. Furthermore, according to Health Canada, approximately 10 percent of the general population has a significant hearing problem. Also, at least 80 percent of the elderly in nursing homes have impaired hearing.

Indeed, The Canadian Hearing Society is proud to have contributed to recent reforms in the Ontario Building Code, and to the development of the Accessibility for Ontarians with Disabilities Act standards. In Ontario, visual fire alarms and emergency notification systems are now required in public hallways of most buildings, such as arenas, stadiums, hospitals, business offices, theatres, etc.; as well as in seating areas of theatres, opera and entertainment facilities where people congregate to view the performing arts; and at least 10% of the sleeping quarters of hotels or motels.

CHS commends The Ministry of Municipal Affairs and Housing for recognizing the importance of providing visual fire alarms as one of the key priorities in the latest Ontario Building Code consultation process. Future changes incorporate and are consistent with the intent of the standards development committee recommendations.

CHS supports that all audible alarms which communicate fire within all places of residence include a visual strobe. This represents fire alarms, smoke alarms and smoke detectors within single family dwellings and multi-unit dwellings. Deaf and hard of hearing Ontarians are vulnerable within their place of residence and need to feel safe by knowing they will be alerted if there should be a fire within their home or place of residence. We also propose that visual fire alarms are not excluded in school classrooms as this denies safety for students and does not meet the intent of the AODA standard, where people have equal access to information and communication. Visual alarms are communication systems which notify of fire.

**CHS Recommendations**

The Canadian Hearing Society’s recommended changes to the OBC are as follows:

1. **Renovation**

While the OBC has made efforts to enhance accessibility requirements which will bring us closer to the goals of the AODA, they primarily are included in new builds. To meet the objectives of the AODA, visual smoke detectors, visual smoke alarms and visual fire alarms (if a fire alarm system is present) must be a requirement when renovations are done.

***Recommendation(s):***

* **Add visual fire alarms, visual smoke alarms and visual smoke detectors during the renovation process – this will move Ontario closer to a barrier free province by 2025.**
1. **Visual Smoke Alarms - Ontario Building Code 3.2.4.22 and change number B-03-02-02**

The OBC recognizes the importance of including visual fire alarms within public spaces of buildings as it is now included within the current building code. CHS recommends that the same provisions be included for visual fire alarms, visual smoke alarms and visual smoke detectors in all single family residential homes and residences within multi-dwelling buildings.

CHS supports the addition to the OBC (Change Number B-03-02-02) recommending the addition of a visual component to smoke alarms which must be hard wired, installed in all residences, including the sleeping areas of the home. The strobe lamp, flash rate and intensity of the strobe light are all within the recommended guidelines. We are however, extremely concerned with clause 6 and 7 which permits the installation of smoke detectors instead of smoke alarms. This same clause does not clearly outline that smoke detectors must have the same accessibility features as that of a visual smoke alarm.

***Recommendation(s):***

* **The clause should relay clear expectations to contractors and include “the addition of the visual component applies to both smoke alarms and smoke detectors.**
* **Visual smoke alarms and smoke detectors are required in all places of residence, including single family dwellings and residences within multi-unit apartment and condominium complexes and not be bound by current legislation noting 3 storeys or more or a building of more than 600 meters.**
1. **Alert and Alarm Signals – Ontario Building Code 3.2.4.18 and change Number B-03-02-01**

To provide visual smoke alarms or visual smoke detectors within dwellings of multi-unit buildings is only providing accessibility to safety in partial terms. This compares to an accessible washroom for people using mobility devices but the entrance is not accessible for those to gain entrance to the building. While the visual smoke alarms and visual smoke detectors are essential within the residence, they will only notify of fire or smoke within the immediate area.

Fire alarms, located throughout the multi-unit building including within suites and sleeping areas are necessary to notify residents of a fire within another part of the building. These units must be visual to provide access to emergency alerts relayed in the form of a strobe light. To not provide complete safety for Deaf, deafened, oral deaf and hard of hearing people with relation to fire safety goes against the provisions of the Ontario Building Code (which includes fire protection and barrier free accessibility). To exclude some forms of accessible visual fire alarms, smoke detectors and smoke alarms in all places of residence, including multi-unit dwellings is a matter of life and death.

***Recommendation(s):***

* **Add visual fire alarms within all mult-unit group buildings, and provide visual fire alarms in barrier free washrooms and universal toilet rooms where a fire alarm system is provided.**
* **Increase the percentage of hotel/motel suites from 10% - 15% due to the increase in senior population more travellers will have hearing loss due to age. Increased percentage is in-line with recommendations put forth for visitable suites.**
1. **Use of Educational and Resource Materials**

CHS does not support the proposed alternate guidelines outlining accessibility features which do not fall within the OBC jurisdiction. Accessibility features that create a barrier free environment are mandatory and promised by the AODA. All recommendations put forward by the development standards committees are expected to be regulated and enforced in order to comply with the intent of the AODA and achieve an accessible Ontario by 2025.

**Conclusion**

The Canadian Hearing Society supports the recommendations of the Ontario Ministry of Municipal Affairs and Housing in its deliberations on barrier-free access requirements in the proposed Ontario Building Code to harmonize with the Fire Code to incorporate visual fire alarms in all care and treatment occupancies as it is moving forward with the recommendations. This will assist a wider society to provide public education in addressing access and health and safety issues in all Ontario buildings to prohibit landlords, real estate sellers, condominium management companies and homeowners’ associations from discrimination based on disability.

Ontario recognizes the importance of visual fire alarms to keep people safe as the current Ontario Building Code dictates that fire alarms are required in public spaces and places of assembly. As we move forward in preparing Ontario to become an inclusive and barrier free province. It is imperative that we include visual fire alarms, smoke detectors or smoke alarms within this jurisdiction. Culturally Deaf, oral deaf, deafened and hard of hearing Ontarians are equally vulnerable within their place of residence and demand to feel safe by knowing they will be alerted if there should be a fire within their home or place of residence.