

ACCESSIBILITY (AODA) POLICY

Approved by: Executive Director

Effective Date: July 2023
Reviewed Date: July 2025

Intent

The Timmins Academic Family Health Team (TAFHT) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws.

The TAFHT is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

The TAFHT understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

The TAFHT is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

Policy

Given our unique situation as a “multisite” organization where in many cases staff are working in facilities owned and managed by other entities (i.e., physician clinics), it is important to understand our responsibilities, our limitations, and our potential impact on the physicians we work with.

Definitions

Assistive Device:

An assistive Device is 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 people 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.

Disability:

The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or 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 insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Service Animal:

Service Animal as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability.

Support Person:

As reflected in Ontario Regulation 429/07, 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 goods and services.

GENERAL PRINCIPLES

In accordance with the Accessibility Standards for Customer Service, Ontario Regulation 429/07, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities
- B. Assistive Devices
- C. Service Animals
- D. Support Persons
- E. Notice of Service Disruptions
- F. Training
- G. Notice of Availability and Format of Required Documents
- H. Feedback from Patients
- I. Employment

A. The Provision of Goods and Services to Persons with Disabilities

The TAFHT 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 people receive the same value and quality;
- allowing people 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 people 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; and
- communicating in a manner that takes into account the person's disability.

B. Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the TAFHT. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

C. Service Animals

Persons with disabilities may enter our premises accompanied by a service animal and keep the animal with them, if the public has access to such premises, and the animal is not otherwise excluded by law. It is the responsibility of the person with a service animal to always control the animal. A service animal means any animal that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability.

Under the Integrated Accessibility Standards of the Accessibility for Ontarians with Disabilities Act ("AODA"), an animal is a service animal for a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, because of visual indicators such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
 - a. College of Audiologists and Speech-Language Pathologists of Ontario;

- b. College of Chiropractors of Ontario;
- c. College of Nurses of Ontario;
- d. College of Occupational Therapists of Ontario;
- e. College of Optometrists of Ontario;
- f. College of Physicians and Surgeons of Ontario;
- g. College of Physiotherapists of Ontario;
- h. College of Psychologists of Ontario; or
- i. College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

In Ontario, if employees can identify that the service animal is used by a person with a disability for reasons relating to a disability, the person cannot be asked to prove the animal is working. If it is not readily apparent that the animal is a service animal then a letter may be requested from a practitioner from the above list of colleges, confirming that the person requires the animal for reasons relating to a disability.

Employees are never allowed to ask about their disability.

The process for employees to follow when requesting documentation to confirm the status of a service animal is:

- (1) is the dog a service animal required because of a disability? and
- (2) what work, or task has the dog been trained to perform?

Service animals shall be leashed and/or otherwise contained from approaching other on-site people. Except for the above-outlined Service Animal policy, the facilities the TAFHT operate will remain pet-free. In the event a staff member or patient is allergic to animals, alternative arrangements will be negotiated.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

D. Support Persons

Persons with disabilities may enter our premises accompanied by a support person and may always have access to that support person. Consent from the person with a disability is required when communicating private issues related to the person with a disability, in the presence of a support person. Non-verbal consent is to be recognized.

E. Notice of Service Disruptions

The TAFHT provides clients with notice if a planned or unexpected disruption occurs regarding services provided to people with disabilities. Notice will be provided in as timely a way as is reasonably possible accompanied with information for people with disabilities of the alternatives of the temporary disruption, this may be provided through a variety of mechanisms, including our website. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will Include:

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notifications Options:

When disruptions occur, the TAFHT will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the website;
- contacting people with appointments;
- verbally notifying people when they are making a reservation or appointment; or

- by any other method that may be reasonable under the circumstances.

F. Training

All persons employed by the TAFHT, volunteers, students, board/committee and individuals of TAFHT who oversee policies are trained on the Act and the implementation of its standards. A record will be kept of employees who have received training, including dates on which training was provided. Training is to be provided on an ongoing basis and delivered in a timely manner after an individual is employed or accepts a volunteer position.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- Requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a service animal; or
 - require the use of a support person.
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.

G. Notice of Availability and Format of Documents:

The TAFHT shall notify people that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that considers the person's disability. Notification will be given by posting the information in a conspicuous place operated by the TAFHT and will be available on our website.

H. Feedback from Patients:

The TAFHT welcomes feedback on our customer service to people with disabilities, and comments will be accepted through a variety of mechanisms such as email or phone. Employees can provide feedback to a TAFHT manager.

I. Employment

The TAFHT is committed to fair and accessible employment practices. We will notify the public and staff that, when requested, we will make all reasonable attempts to accommodate disabilities during recruitment and assessment processes, assuming this disability does not preclude the applicant from being able to fulfill the job requirements.

If needed, we will make all reasonable attempts to create an individual accommodation plan and/or workplace emergency information for any employees who have a disability. Our performance management, career development, redeployment, and return-to-work processes will consider the accessibility needs of employees with disabilities.

References

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Person's Rights Act
- Dog Owners' Liability Act
- Food Safety and Quality Act, 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code