1. Accessibility Guide

1.1. Introduction

The Accessibility for Ontarians with Disabilities Act, 2005 (or “AODA”) is a provincial law with the goal to make Ontario accessible for people with disabilities by developing and enforcing accessibility standards.

The accessibility standards are the legal requirements that organizations in Ontario must follow to become more accessible to people with disabilities. They address key areas of daily life, including customer service, information and communication, employment, transportation, and design of public spaces.

1.2. Statement of Commitment

Appletree Medical Group Inc., along with its subsidiaries and affiliates (collectively, “AMG”) is committed to providing a respectful, welcoming, accessible, and inclusive environment for all persons with disabilities in a way that is respectful of the dignity and independence of people with disabilities and in a manner which takes into account the person’s disability and embodies the principles of integration and equal opportunity.

AMG is committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals in relations to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with AMG.

AMG will strive to ensure that the AODA, its regulations, standards and all other relevant legislation concerning accessibility, are observed in a timely fashion.

AMG ensures that all persons within its community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.
2. Key Terms and Concepts

2.1. Disability

The AODA uses the same definition of “disability” as the Ontario Human Rights Code. Disability can be visible or non-visible and it covers a wide range and degree of conditions. A disability can be temporary or permanent; it could have been present from birth, caused by an accident, or developed over time. Disabilities include but not limited to, physical, mental and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, drug and alcohol dependencies, environmental sensitivities, and other conditions.

2.2. Barrier

Barriers can prevent a person with a disability from fully participating in society; a barrier can be physical, communications, attitudinal or systemic.

2.3. Accessible Formats

Accessible Formats include but not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

2.4. Assistive Device

A technical aid, communication device or other piece of equipment that is used to maintain or improve the functional abilities of people with disabilities. Most assistive device are personal assistive devices, such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space.

2.5. Communication Support

Communication supports include but are not limited to sign language, plain language and other communication supports that facilitate effective communications.
3. Roles and Responsibilities

3.1. The AMG Executive team is responsible for:
- maintaining and the governance of the policy;
- corporate liability for compliance with legislative requirements, including fiscal responsibility, human costs and human rights issues;
- supporting and promoting the policy with their direct report and throughout the organization; and,
- fostering an organizational culture that includes a high level of understanding of disability and commitment to accommodations.

3.2. The AMG Senior Leadership team and Managers are responsible for:
- respecting confidentiality of information;
- raising awareness to improve adoption and facilitate understanding of the policy;
- participating and cooperating to facilitate workplace accommodation; and,
- fostering open and constructive communication.

3.3. AMG Employees are responsible for:
- participating and cooperating with all parties to facilitate workplace accommodation;
- supporting and following the accessibility customer service policy; and,
- actively participating in training initiatives related to accessibility.

3.4. The AMG Human Resources team is responsible for:
- participating and cooperating with all parties in relations to accessibility and workplace accommodation;
- acting as a resource for all parties and participants; and,
- supporting and educating managers in their roles and responsibilities.

4. Integrated Accessibility Standards Regulation Policy

4.1. Purpose

The Integrated Accessibility Standards Regulation (or “IASR”) outlines accessibility standards for all organizations in Ontario. Its purpose is to increase accessibility for persons with disabilities specifically in the areas of:
• Information and communication
• Employment
• Customer Service

4.2. Accessibility Plan

AMG has developed a multi-year Accessibility Plan in consultation with a cross-functional team that helped to identify barriers that prevent a person with a disability from fully participating in aspects of society because of their disability. The Accessibility Plan documents our strategy and commitment to meet the standards of the IASR. It will be reviewed and updated at least once every five years in consideration of our progress and current legislative guidelines. AMG will prepare a status report annually on the progress and measures taken to implement our Accessibility Plan.

The Accessibility Plan and annual report can be provided in an accessible format upon request.

4.2.1. Training

AMG will ensure that all workers will receive AODA training in a timely manner upon joining our organization. The training will be aligned with the requirements of the accessibility standards included in the IASR. AMG will continue to stay up to date with the accessibility standards and Human Rights Code as it pertains to persons with disabilities and provide supplementary training as appropriate. Records of accessibility related training will be retained in personnel records.

AMG has developed a training plan that integrates the requirements of the IASR with its current Customer Service training module, which was implemented for existing and new employees since January 1, 2015. AMG has since revised the entire accessibility program and created a robust training plan which identified specific groups that require supplementary training (i.e. marketing, managers, senior leadership, and human resources). The material is provided in an eLearning format, and roll-out plan includes all existing and new employees in the aforementioned roles.
4.2.2. Information and Communication Standards

4.2.2.1. Feedback

AMG will ensure that its processes for receiving and responding to feedback are made available to persons with disabilities, whether members of the public, clients, patients or employees. Feedback processes will be in an appropriate, accessible format or communication support, upon the individual’s request, and members of the public will be notified of the availability of such an option.

4.2.2.2. Accessible Formats and Communication Supports

AMG will, upon request and consultation, endeavour to provide information and communications under our control about our services to people with disabilities using the appropriate accessible format or communication support wherever possible, in a timely manner and on par with the fee charged to others for the same information. AMG will notify the public about the availability of accessible formats and communications supports.

4.2.2.3. Accessible Websites and Web Content

AMG is committed to ensuring accessibility of its website to people with disabilities. We strive to have new and updated web content produced by our organization meet the AODA accessibility standards based on the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA guidelines from W3C, by January 1, 2021. Existing web content produced by our organization already meet those standards.

Content provided for our site by third-party developers will meet AODA guidelines based on WCAG 2.0 by January 1, 2021. This does not include user-generated content or other third-party websites not under our control that may be accessed through hyperlinks on our website.
We aim to ensure that our authoring tools and processes meet the AODA accessibility standards based on the WCAG 2.0 Level AA guidelines from W3C. We preferentially purchase authoring tools and web applications that meet or exceed our web accessibility policy. In particular, our website offers a range of accessibility tools developed by Accessibe (please see https://accessibe.com/compliance/aoda for more information).

We will review this policy annually. This policy was last reviewed on the date below by Appletree’s Corporate Secretary.

4.2.3. Employment Standards
4.2.3.1. Recruitment

AMG will ensure that all employees and external applicants are aware of the availability of accommodation for applicants with disabilities in its recruitment process.

4.2.3.2. Screening and Selection Process

AMG will ensure that job applicants are informed when they are selected for individual assessments that accommodation for disabilities are made available upon request. In consultation with the individual requesting the accommodation, AMG will provide appropriate accommodations for the applicant.

4.2.3.3. Job Offers

AMG will notify successful applicant of its policies for accommodating employees with disabilities.

4.2.3.4. Informing Employees of Accessibility Supports

AMG will ensure that all employees are informed of accessibility 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 in a timely manner upon joining our organization.

4.2.3.5. Accessible Formats and Communication Supports for Employees

Upon request from an employee with a disability, AMG will consult with the employee to provide, or arrange for accessible formats and communication supports for information that is needed to perform their job, and information that is available to other employees. In consultation with the employee making the request, AMG will determine the suitability of an accessible format or communication support.

4.2.3.6. Workplace Emergency Response Information

Employees are advised to inform AMG of the need to accommodate a disability, in return AMG will provide the employees with disability individualized workplace emergency response information during the applicable situations.

4.2.3.7. Documented Individual Accommodation Plans

AMG currently has an accommodation policy as part of its Occupational Health and Safety program. Accommodation will be provided in accordance with the principles of dignity, individualization and inclusion. AMG will work cooperatively, and in a spirit of respect, with all partners in the accommodation process. It is a formalized process in which AMG will consult, develop, determine, document, review and routinely update the individualized accommodation plan. Reasonable efforts will be put towards measures to effectively maintain the privacy of workers with disabilities.

4.2.3.8. Return to Work Process
AMG will maintain a documented return to work plan for workers who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work. It is a formalized process in which AMG will consult, develop, determine, document, review and routinely update the individualized return to work and accommodation plan. Reasonable efforts will be put towards measures to effectively maintain the privacy of workers with disabilities.

4.2.3.9. Performance Management, Career Development and Advancement Plan

The AMG accommodation policy applies to all stages and to all aspects of the employment relationship, including performance evaluations, providing career development and advancement opportunities, and when transferring employees.

5. Accessibility Customer Service Policy

5.1. Purpose

As a part of the AODA, the Accessibility Standards for Customer Service establishes accessibility standards specific to customer service for all organizations that provide goods and services to members of the public or other third parties.

The objective of this policy is to identify what the equal treatment provisions of the Ontario Human Rights Code, through the AODA, require with respect to service delivery to persons with disabilities and addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices;
- The Use of Guide Dogs and Service Animals;
- The Use of Support Persons;
- Notice of Service Disruptions;
- Customer Feedback;
- Training; and,
- Notice of Availability and Format of Required Documents.

5.2. Statement of Commitment and Accountabilities
5.2.1. Commitment

AMG is committed to providing a respectful, welcoming, accessible, and inclusive environment in the provision of goods and services for patients, clients and workers alike. Services will be provided in a way that is respectful of the dignity and independence of people with disabilities and in a manner, which takes into account the person’s disability and embodies the principles of integration and equal opportunity.

AMG is committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals in relations to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with AMG.

AMG will strive to ensure that the AODA, its regulations, standards and all other relevant legislation concerning accessibility, are observed in a timely fashion.

AMG ensures that all persons within its community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

5.2.2. Key Principles

All services provided by AMG shall follow these principles:

- respect for the **dignity** and **independence** of people with disabilities;
- **equal opportunity** for people with disability to access, use and benefit from our services or programs with the same quality and timeliness that others receive; and,
- service **integration** in relation to services provided to the broader public, unless alternative ways of providing the service or program are necessary for equal opportunity.

5.2.3. Scope
This policy applies to the provision of goods and services at premises owned and/or operated by AMG, as well as any interactions with workers, patients, and clients via telephone, Email or written mail.

This policy applies to all workers, including paid employees, volunteers, AMG’s authorized agents who deal with the public.

5.2.4. Definitions

5.2.4.1. Guide Dog:

A dog trained as a guide to provide mobility, safety and increased independence for people who are blind.

5.2.4.2. Service Animal:

An animal for a person with disability. In this policy, a service animal is:
- any animal used by a person with a disability for reasons relating to the disability; or,
- where the person provides documentation from a regulated healthcare professional confirming that they require the animal for reasons relating to their disability; or,
- where the person provides a valid identification card signed by the Attorney General of Canada.

5.2.4.3. Support Person:

A support person can be a paid personal support worker, an intervenor, volunteer, family member or friend. A support person might help with a person with a disability with communication, mobility, personal care or with accessing services.

5.3. Customer Service Policy, Practice and Procedures

5.3.1. The provision of services to persons with disabilities
AMG 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 patients and clients receive the same value and quality;
- allowing patients and clients 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 customers 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 patient’s and client’s disability.

Best Practices:

AMG workers and representatives will be encouraged to be proactive in seeking solutions and removing barriers, as well as alerting all patients and clients to the range of accommodations that are available.

The term “persons with disabilities” will be the norm, and if a specific condition is referenced, the condition will be referenced last (e.g. person with hearing loss). The following are general tips on communication and interaction with people with disabilities:

- Put people first. It is proper to say person with a disability, rather than disabled person or the disabled.
- Ask before you help. Don’t assume the person needs it or what they need. Allow the individual to describe their situation to you before taking steps to accommodate them.
- Speak directly to your customer, not to their support person or companion.

5.3.2. Assistive Devices
People with disabilities may use their personal equipment as needed to assist them in accessing services at AMG. In the event that the assistive device presents a health and safety risk, alternative measures will be determined to ensure access of services.

5.3.3. Guide Dogs and Service Animals

A patient or client with a disability that is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. If there is a conflict between a provision of the Dog Owner’s Liability Act, Ontario, or of a regulation under this or any other Act relating to banned breeds and a provision of a municipality by-law relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. If a guide dog or service animal is excluded by law, AMG will try to offer alternative accommodations to enable the person with a disability to access services, when possible.

If it is not visibly apparent that the animal in question is being used for reasons relating to the person’s disability, AMG may request verification from the patient or client. Verification may include:
- identification card confirming the use of a service animal; or,
- documentation from a regulated healthcare professional confirming that the person requires the animal for reasons relating to a disability.

The patient or client is responsible for the care and supervision of their service animal. However, AMG employees will provide water for the animal upon request.

5.3.4. Allergies

If another person’s health or safety could be seriously impacted by the presence of a service animal, such as severe allergies, AMG employees will consider all options to try and find a solution that meets the needs of both people.

5.3.5. Support Persons
A person with a disability is permitted to bring their support person with them to any area of our premises. The patient or client will not be prevented from having access to their support person.

5.3.6. Training

Training on the accessibility standards will be provided to all workers (including paid employees, agents, contractors, volunteers, etc.) who interact with the public. In the event of changes to legislation, AMG will revise its policies and procedures, and provide supplementary training to its workers. Training records will be retained in all workers' HR records.

5.3.7. Notice of Disruptions in Services

In the event of any temporary disruptions to services or facilities that patients or clients with disabilities rely on, reasonable efforts will be made to provide advance notice. However, advance notice may not be possible in some situations, such as unplanned temporary disruptions.

AMG will make reasonable efforts to resolve service disruptions, provided that they are within our control. In the meantime, employees will consider alternative methods in assisting any patients and clients with disabilities.

5.3.8. Feedback Process

Patients and clients will have the opportunity to provide feedback regarding the services provided to persons with disabilities. Information about the feedback process will be readily available to all patients and clients through our website and at each clinic location.

Feedback will be accepted verbally in person, written by mail or fax, written through the feedback form on our website, written by E-mail, or verbally over the telephone. All feedback will be investigated and reviewed internally, and a
response will be provided within 20 business days in the appropriate format. If the patient or client does not wish to receive a response, this step will be skipped but the feedback will be reviewed and addressed as appropriate.

5.3.9. Availability and Format of Documents (Alternative Formats)

All documents required by the Accessibility Customer Service Standards are available in alternative formats upon request.

5.3.10 Contacting AMG

If you have any questions, comments or concerns regarding accessibility, please contact Appletree Medical Group.

By Email:
accessibility@appletreemedicalgroup.com

By Phone:
(613) 726–3558

Last Reviewed: January 19, 2021.