

POLICY: Accessibility For Ontarians With Disabilities (AODA) Integrated Accessibility Standards (IAS)	POLICY #: HR (September 2 , 2015)
ORIGINATOR:	VERSION DATE: July 03, 2021
APPLIED BY: Management	REPLACES: AODA Customer Service Standards (now consolidated into this policy)
APPROVED BY:CEO	PAGES: 1 - 51

PURPOSE

The purpose of the policy is to provide support and direction to AS York to ensure compliance with the *Integrated Accessibility Standards* (“IAS”), Ontario Regulation 191/11 under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA).

Effective July 1, 2016, the *Integrated Accessibility Standards* consolidate the *Accessibility Standards for Customer Service* (“Customer Service Standard”) into a single Accessibility Standard.

This policy is intended to meet the requirements of the IAS for the Information and Communications Standards, The Employment Standards, Transportation Standards, Built Environment, and the Customer Service Standards, as applicable.

INTRODUCTION:

The purpose of the AODA is to benefit all Ontarians through the development and enforcement of standards designed to achieve “accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.”

The government of Ontario passed the Act in 2005 to remove barriers and make Ontario a welcoming and accessible place for persons with disabilities.

The Act sets out accessibility standards in five key areas of daily living:

1. Customer service
2. Information and communications
3. Employment
4. Transportation
5. Built environment

The Customer Service Standard (Ontario Regulation 429/07) was the first standard that came into force. All private and non-profit organizations had to comply with the law by January 1, 2012.

The standards for Employment, Information and Communications, and Transportation are in the Integrated Accessibility Standards (Ontario Regulation 191/11) which came into force on July 1, 2011; AS York had to comply with many of these regulations by January 1, 2016.

Requirements for this Standard are being phased in. They address how AS York communicates with staff, students and volunteers, clients, and the public. This includes the AS York's website, training and development, and internal and external workplace communications.

SCOPE AND APPLICATION:

This policy applies to all AS York programs and services and will be upheld by all staff, students, volunteers, and agents who provide programs and services.

Failure to comply with this policy may result in disciplinary action.

POLICY

AS York is committed to providing excellent service to all clients, and to making reasonable efforts to ensure that clients with disabilities are provided the same opportunity to access goods, services, and facilities, and to benefit from the same level of services in the same place and in similar way as other clients.

AS York is also committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing identified barriers to accessibility, educating employees, and meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and the related *Integrated Accessibility Standards*.

This policy applies to the provision of:

- customer services
- information and communications services and materials
- accessible employment services
- accessible transportation services, and,
- the design of public spaces for people with disabilities.

The policy and standards for the design of public places apply to removing barriers in two (2) areas:

- Buildings; and
- Public spaces.

All services provided by AS York will observe the principles of dignity, independence, integration and equal opportunity for persons with disabilities. (see Appendix A, Definitions).

Service will be offered to clients with disabilities in the same way as it is to other clients, unless a different way of offering the service is necessary on a temporary or permanent basis. AS York will use alternative methods when possible to ensure that clients with disabilities have access to the same services and programs, in the same place and in a similar manner, taking into account the client's individual needs.

Clients with disabilities will be offered a variety of ways to communicate to access goods and services that take into account the client's particular disability (see **Appendices C-E, Communication Guidelines**).

AS York will ensure that clients with disabilities continue to have the assistance of a support person, service animal, or personal assistive device as required during their service.

Related legislative and regulatory requirements are addressed in the procedures.

The policy will be reviewed annually and as required to reflect changes in legislation/regulation, and other relevant changes as they arise.

It should also be noted that under the current legislation, AS York is now considered a "small organization" for all the standards in the IAS – e.g. having at least one but fewer than 50 employees. Wherever it is operationally feasible, AS York will make every effort to meet the obligations of a large organization.

A. General Requirements

General requirements that apply across all of the four (4) standards - Information and Communications, Employment, Transportation and Design of Public Spaces, are outlined as follows.

Establishment of Accessibility Policies and Plans

AS York will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Although it is not mandatory, AS York will:

- include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.
- establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.
- review and update its accessibility plan once every five (5) years
- prepare an annual report (for the QSP) on the progress of the steps taken to implement the accessibility plan. This status report will be posted on our website (tbd). If requested, the report shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

Although it is not mandatory, AS York will incorporate to the extent possible, accessibility criteria and features when procuring or acquiring goods, services or facilities. Exceptions will be made in cases where it is impracticable to do so.

Training Requirements

AS York will provide training for its employees and volunteers regarding the IASR and the *Ontario Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing policies, and all other employees, volunteers, and persons who provide goods, services, and facilities on behalf of the organization on how to provide accessible customer service.

Training on the IAS will be provided:

- in a way that best suits the duties of employees, volunteers, and Board of Directors
- on an ongoing basis regarding changes to policy, procedures and practices as required
- to new staff, who will receive training (review of policy and training presentation, and online training within one month of commencing their duties).

In addition, in accordance with the requirements set out in Section 80.49 of the July 2016 revised IASR regarding customer service, training must include a review of the purposes of the Act and instruction about the following matters:

- How to interact and communicate with persons with various types of disability
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person
- How to use equipment or devices available on AS York's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability e.g. wheelchairs, walkers, canes
- What to do if a person with a particular type of disability is having difficulty accessing AS York's goods, services or facilities

Training on the consolidated standards, new requirements, and policy changes must take place for all persons as soon as is practicable. Staff who previously received training on customer service standards and the IAS will receive updates on changes to the customer service standards.

Records

Although it is not mandatory, AS York will maintain records on the training that has been provided. The Manager/Program manager at each site will forward a record of the training provided, including the names of attendees, the dates of the training, and the total number of individuals who received training. The Manager, Finance and Support Services will ensure that training is recorded in Goldcare and the employee file.

B. Feedback Process

AS York will ensure that all feedback processes (both internal and external) are made accessible to clients/customers or employees, upon request, by arranging for

accessible formats or communication supports.

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, AS York will make the availability of accessible feedback formats publicly known.

AS York will collect and respond to client feedback regarding the manner in which it provides goods, services or facilities to persons with disabilities, and whether the feedback process complies with the regulation e.g. is accessible, whether formats or communication supports were provided. Programs evaluations are conducted on a regular basis and feedback is welcome.

Clients who wish to provide feedback are encouraged to speak directly with staff, students, or volunteers. All feedback will be directed to the CEO. Complaints will be addressed through AS York's complaint procedures. (See AS York's Complaints Policy).

AS York will provide a written feedback form on its website as well as a paper form at all AS York locations for clients to provide feedback on their service experience (see Appendix G, Record of Client Feedback).

Feedback could also be submitted by other means e.g. email, telephone, in writing, program survey, and fax.

C. Communication, Accessible Formats, and Communication Supports

AS York will make every reasonable effort to:

- communicate with clients with disabilities in ways that take into account their disability
- provide a suitable method of communication that is agreed upon with the client.

Communication methods may include the use of email or relay services if telephone communication is not suitable to the client's needs, or is not available. (**See Appendices C-E, Communication Guidelines**).

Upon request, documents/invoices will be provided in hard copy, large print, or email, and staff will respond to client questions regarding the content of their documents/invoices in person, by telephone, or by email.

AS York will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request, *unless the information is deemed unconvertible*. Accessible formats and communication supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.

AS York will:

- take into account the person's accessibility needs when customizing individual

requests and shall consult with the individual making the request to ensure suitability.

- make the availability of accessible formats and communication supports publicly known.

D. Service Animals

AS York will welcome clients with disabilities who are accompanied into the building by a guide dog or service animal.

The IASR states that a “guide dog” means a guide dog as defined in section 1 of the *Blind Persons’ Rights Act*. The IASR also states in Section 80.45 (4) that an animal is a service animal for a person with a disability if,

(a) the animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal; or

(b) the person provides documentation from a list of regulated health professionals confirming that the person requires the animal for reasons relating to the disability.

If it is not obvious that the animal is a service animal, AS York may request that the person with a disability provide documentation from a member of one of the following list of regulated health professionals in Ontario, confirming that the person needs the service animal for reasons relating to his/her disability:

- Audiologist
- Speech-Language Pathologist
- Chiropractor
- Nurse
- Occupational Therapist
- Optometrist
- Physicians
- Physiotherapist
- Psychologist
- Psychotherapist, and
- Mental Health Therapist.

Service animals are allowed on the parts of AS York premises which are open to the public. A person with a disability will be allowed to keep a service animal with him/her unless the animal is not allowed by law, e.g. in a restaurant kitchen, operating room, intensive care unit. If the service animal is not allowed by law (see Appendix L for additional related legislation), or if the animal might affect the health and safety of another client, AS York will provide an explanation to the client and seek other ways to provide services, e.g. offer staff guidance and offer to secure animals in a safe location.

Potential barriers to the use of support persons or service animals will be removed

wherever possible. (see Appendix J, Barriers and Solutions).

An individual that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

If a health and safety concern presents itself in the form of a severe allergy to the animal, AS York will make all reasonable efforts to meet the needs of all individuals.

E. Support Persons

AS York will welcome clients with disabilities who are accompanied into the building by a support person. Currently, due to the nature of the programs and potential risks, private caregivers are not permitted in the Adult D.A.Y. Programs. However, a support person who was needed to protect the health or safety of the person with a disability or the health or safety of others on the premises, or who was performing functions in the role of a facilitator/interpreter e.g. sign language would be permitted to attend. Prior to requiring the presence of such a support person, AS York would first consult with the person with a disability, as well as the caregiver and/or family, and consider the health and safety implications based on available evidence. The presence of a support person may then only be required if there is no other reasonable way to protect the health and safety of the person or of others on the premises. In these situations, lunch would not be provided to support persons. Where the presence of a support person is *required*, any applicable admission fee or fare must be waived for that person. Note: In the future, if support persons are to be charged a participant fee, advance notice must be given about the amount that the support person must pay, and notices about fees may be posted on a sign, brochure, or website.]

If a person with a disability is helped by a support person, the person with a disability may stay with the support person while accessing service. If the person with the disability is going to a private meeting or counseling service, it may be appropriate for the person with the disability to give documented permission for the support person to attend.

F. Assistive Devices

AS York will make every effort to accommodate any clients who use an assistive device to access services on AS York's premises or at AS York programs.

Clients with disabilities may use their own assistive devices as required. If the device is not allowed by law, AS York will provide an explanation to the client and seek other ways to provide services. Potential barriers to the use of assistive devices will be removed wherever possible (see Appendix J, Barriers and Solutions).

Each AS York site will maintain, as required, a list of:

- assistive devices available at their location (clients provide their own devices)
- job positions that may require knowledge regarding how to use the devices to help clients acquire services
- staff who have been trained on the use of devices for their particular work

(including the date of training and the particular device in Goldcare)

Each AS York site will inform clients with disabilities of available assistive devices by sign, brochure, and/or subsequently on the website.

G. Notices Re Temporary Disruptions

AS York will post a written notice as soon as possible on its website and in a conspicuous location at individual sites if there are any temporary disruptions of services/programs/facilities at AS York locations e.g, repairs to accessible doors, elevators.) The notice will include details regarding the reason for the disruption and the duration (if known) as well as any alternatives available to continue with service. If appropriate, voice-mail messaging or other methods which are reasonable under the circumstances may be used, taking into account those clients with disabilities who may be most affected and matching the method of communication to their needs (see Appendices C-E). Although not a requirement for a small organization, AS York, upon request, may elect to prepare and provide a document setting out the steps that it will ensure are taken in connection with a temporary disruption.

H. Notice of Documents Available Upon Request

Each AS York site will post a notice on the premises in a conspicuous location, informing clients of how to request the following document(s):

- Policies, practices, and procedures re:
 - services to clients with disabilities
 - the use of service animals and support persons
 - processes to notify clients re disruptions to services/facilities used by clients with disabilities
 - provision of training on accessible customer service
 - process to receive and respond to client feedback on services to clients with disabilities

Although not a requirement for a small organization, AS York, upon request, will provide documents in a format agreed upon by both parties, and in accordance with the format requirements set out in the regulation (see Section I below, regarding Format requirements.) The policy will also be posted on the website.

I.Format

If required to give a copy of a document to a person with a disability, AS York shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support:

- in a timely manner that takes into account the person's accessibility needs due to disability; and
- at a cost that is no more than the regular cost charged to other persons.

AS York will consult with the person making the request in determining the suitability of an accessible format or communication support.

J. Emergency Procedures, Plans or Public Safety Information

Although AS York does not prepare (and make available) public emergency procedures, plans or public safety information, it will ensure that all publicly available safety and emergency information (e.g. evacuation procedures, floor plans etc.) are provided in an accessible format or with appropriate communication supports, upon request.

K. Accessible Websites and Web Content

AS York will ensure that its website and all web content published after January 1, 2012, conforms to the Web Content Accessibility Guidelines (WCAG) 2.0 in accordance with the schedule set out in the IASR. WCAG 2.0 is an industry standard which covers a wide range of recommendations for making website content more accessible. (These guidelines help to make the website accessible to a wider range of people with disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these. The guidelines provide tests to ensure that web content is “perceivable, operable, understandable and robust”.)

L. Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, AS York will ensure that the individual who made the request is provided with an explanation and a summary of the information.

AS York will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

M. Recruitment, Assessment and Selection

AS York will notify staff, students, volunteers, and the public about the availability of accommodation for job applicants who have disabilities. Applicants selected for an interview will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, AS York will consult with the applicant and provide or arrange for suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Successful applicants will be made aware of AS York's policies and supports for accommodating people with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

AS York will ensure that new staff, students and volunteers are aware of its policies for employees with disabilities as soon as practicable after they begin their employment, and that everyone is kept informed of any changes to these policies as they occur. A copy of this policy will be provided to new employees during orientation.

H. Accessible Formats and Communication Supports for Employees

If an employee with a disability requests it, AS York will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

AS York will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

N. Workplace Emergency Response Information

Where required, AS York will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee. If the employee requires assistance and gives consent, AS York will provide the workplace emergency response information to the person designated by AS York to provide assistance to the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- AS York reviews general emergency response policies.

O. Documented Individual Accommodation Plans (IAPs)

Although not mandatory, AS York will develop and have in place written processes for the development of documented individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans shall include specific elements, including:

- The ways in which the employee requesting accommodation can participate in the development of the plan
- The means by which the employee is assessed on an individual basis
- The ways that AS York can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, and/or how it can be achieved
- The manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan
- The steps taken to protect the privacy of the employee's personal information
- The frequency with which the individual accommodation plan should be reviewed

- or updated and how it should be done
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs due to a disability.

Individual accommodation plans shall:

- if requested, include any information regarding accessible formats and communications supports provided, as described in section 26 of the IAS e.g., information needed to perform the employee's job, and that is generally available to employees in the workplace
- if required, include individualized workplace emergency response information, as described in Section 27 of the IAS and in Section N of this policy, and
- identify any other accommodation that is to be provided.

Process/Guidelines for Developing an Individual Accommodation Plan (IAP):

This written process for developing individual accommodation plans will include the requirements set out in Section 28 of the IAS Regulation and Section O (above) in this policy. The process may require modification to take into account the particular circumstances and needs of the individual employee.

An employee makes a request for accommodation OR AS York reasonably suspects that the employee requires accommodation Note: it is not necessary that an employee actively request accommodation. Where an employer knows or reasonably ought to know an employee requires accommodation the employer has an obligation to make appropriate enquiries.

Employees who wish to raise a potential accommodation issue shall do so by submitting a request for accommodation, preferably in writing, to their immediate director/manager/supervisor. The request shall:

- Describe the condition or circumstances causing the accommodation issue, and
- Describe, in detail, the accommodation sought to address the need.

Determine whether there is a link between the request for accommodation and a prohibited ground under the Human Rights Code (e.g., does the request for accommodation relate to one of the following: race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex sexual orientation, gender identity, gender expression, age, marital status, family status or disability) Where no link exists, the duty to accommodate will not be triggered.

Consult with the employee seeking accommodation to understand the nature and basis of the request, as well as any suggestions or recommendations the employee may have regarding accommodation. The accommodation process is a collaborative one and the employer and employee all have a role to play in the process.

AS York employees seeking accommodation are required to:

- participate in the development of the plan, and expected to provide their fullest cooperation in providing any necessary, sufficiently detailed information and medical assessments describing the employee's needs which are relevant to determination of the accommodation request
- provide the necessary information within the specified time following AS York's request unless a legitimate justification for extending the timeline exists
- make best efforts to perform work assigned by AS York
- promptly notify AS York and provide updated medical or other information if there is a change to the employee's medical needs or prognosis.

Failure to meet the above mandatory obligations i.e. failure to cooperate and/or participate in the development or performance of the IAP is considered a breach of the policy and could result in employment consequences.

The employee may request a representative from the workplace to assist in the development of the IAP in circumstances where the employee requires the assistance of a representative due to the nature of his/her disability. (The employee's representative should be a superior, with a clear disciplinary record. tbd)

During the assessment, there may be circumstances under which the employee will be placed on administrative leave with pay while the individual assessment is being performed (for example, where the employee's presence in the workplace presents a risk to the safety of the employee or others.)

The CEO and Director/Manager will request and review supporting documentation and/or documentation to substantiate the request for accommodation (e.g. doctor's note, hospital records, treatment plan, etc.)

Wherever possible, these requests for information and documentation shall be in writing so that all requests are documented. Note: Employers are typically not entitled to ask for an employee's medical *diagnosis*. However, in most circumstances, it is reasonable to request provision of information about (i) the general nature of the employee's illness or disability;(ii) the employee's prognosis;(iii) what limitations or medical restrictions the employee may have;(iv) whether the limitations prevent the employee from performing his/her regular job duties and responsibilities;(v) what, if any, modifications and/or accommodations can be implemented in order to return the employee to work; and (vi) when it is anticipated that the employee will be capable of returning to work, either with or without accommodation.

The CEO and Director/Manager will first seek information provided by a qualified medical professional who has had the opportunity to evaluate the employee before developing the IAP.

The CEO and Director/Manager will jointly assess the accommodation issue in light of the information provided and the individual needs of the employee.

AS York has the right to require further information and/or clarification, including

relevant medical information or opinions that will assist AS York to determine if accommodation can be achieved and how it can be achieved. Note: Ordinarily an employer will *not* be permitted to contact an employee's physician or health care provider directly without the employee's consent. AS York will observe best practice when seeking additional medical information or documentation by providing an employee with a letter outlining the request and providing consent, which the employee can bring to his/her physician.

AS York has the right to:

- Require an independent medical examination; and/or
- Involve a third party medical professional selected by the employer to engage directly with the employee's medical professional on the employer's behalf in the following circumstances:
 - Despite repeated requests, the employee's medical professional has not provided information required by the employer, and or the information is inappropriate or insufficient
 - The information provided by the employee's medical professional is conflicting/contradictory and the medical professional is unable or unwilling to provide a reasonable explanation for the conflict
 - The employee's medical professional is not qualified to provide the necessary information about the employee's medical condition
 - The employee has engaged in serious misconduct (i.e. theft, harassment, etc.) which the employee's medical professional asserts is caused by the employee's disability but the employer has an objective basis to question that opinion
 - The employee has engaged in or threatened violence and the employer requires an independent assessment to ensure the safety of the employee, the employee's co-workers and/or the public.

In any of the above circumstances, the employee is required to provide all necessary consents.

AS York may request that the employee participate in a formal needs assessment by a qualified medical practitioner or other trained professional at the employer's expense (including lost time from work) associated with getting independent medical information and/or in order to assist in determining what accommodation is needed, how much it will cost, and how it can be provided.

Once it has been determined that the employee's request for accommodation (i) relates to a prohibited ground; and (ii) legitimately requires the employee to be accommodated in the workplace, ***assess available accommodation***.

This includes reviewing the following factors, recording and documenting the steps taken, factors considered and reasons why a particular conclusion was reached:

- **The Employee's Regular Position:**
 - Can the employee perform his/her existing job?

- If the answer is “no”, can the employee perform the job in a modified form e.g. modified scheduling, use of supportive devices, etc.
- If the answer is “no”, the employer must proceed to the second stage of the assessment process-looking at other available positions in the workplace.
- **Other Positions in the Workplace:**
 - A thorough review of the workplace should be undertaken. If the employee cannot perform any other existing position in the workplace, the employer must consider “bundling” of duties.
- **Bundling of Duties:**
 - Can the employee perform tasks and responsibilities from various positions across the organization which can be “bundled” together to provide the employee with an opportunity to perform a productive and useful job.
 - Consider whether it is possible, absent undue hardship, to “create” a position by rebundled duties and responsibilities.

Consult with the employee as well as with the employee’s healthcare provider where professional guidance is required, throughout the assessment process to ascertain the suitability of any available accommodation options.

The CEO and Director/Manager will jointly finalize a decision regarding the accommodation issue.

The Manager will consult with the employee **regarding accessible formats, and communicate the decision to the employee in writing** (or other format as required by the employee’s disability), **and the reason(s) for the decision, and in a timely manner**. AS York has the right to select a preferred format if more than one format will be available and appropriate.

- Note: An employee is not entitled to their *preferred* method of accommodation. The duty to accommodate simply requires the employer to provide an employee with *reasonable* accommodation, up to the point of undue hardship.
- Where it is determined an employee cannot be accommodated because no suitable work is available or because to do so would cause the employer undue hardship, objective evidence should be gathered and recorded in support of such a conclusion.
- **If an IAP is denied**, the Manager will consult with the employee regarding accessible formats, and communicate the decision to the employee in writing (or other format as required by the employee’s disability), and the reason(s) for the decision, and in a timely manner
- However, AS York recognizes that **the duty to accommodate is an ongoing duty** which requires the employer to periodically revisit whether accommodation is possible, either because of changes in the workplace or because of changes

in the employee's restrictions.

If the employee is not satisfied with the written decision regarding the request for accommodation, the employee may appeal the decision to the CEO for further review. The decision of the CEO shall be final and binding upon the parties.

Where appropriate accommodation has been identified **implement as soon as practicable** in a matter that respects the employee's privacy.

AS York shall ensure that the employee's personal medical information shall be kept confidential and only disclosed to those necessary in the assessment and development of the accommodation in accordance with the privacy policy. This also usually means that the accommodation plan should only be discussed with those in the organization who need to know in order to facilitate the accommodation. The information will be collected by Human Resources, and only the information that is necessary to develop and facilitate an IAP will be disclosed to the employee's direct Manager/designate (usually the person(s)) directly involved in the process.

The employee's current medical information will be retained for 7 years and stored in a locked cabinet. Records will be disposed after 7 years using AS York's external shredding service.

AS York shall provide individualized workplace emergency response information to disabled employees who require it, and to any person designated to assist the disabled employee, with the consent of the disabled employee, as indicated in the IAP.

AS York shall review the individualized workplace response information upon the following events:

- when the employee moves to a new location in the workplace
- when the employee's overall accommodation needs are reviewed, and
- upon review of AS York's general emergency response policies

The IAP will also include how information required to perform the employee's job and generally available to other employees will be provided in an accessible format or with communications supports if this is requested by the employee.

If there is any other accommodation and support required which is specific to the employee, it will also be included in the IAP.

Once implemented, accommodation should be **monitored regularly** by the Manager/designate to ensure it continues to meet the needs of the employee. Note: It is not uncommon for an employee's needs to change or evolve over time and an employer may be required to review and modify the accommodation plan should circumstances change. This includes discontinuing accommodation where it is no longer required.

Throughout the accommodation process, the lines of communication between AS York

and the employee should be kept open, in order to facilitate the accommodation process and assist in ensuring that all parties meet their obligations.

Employees who are absent from work due to their disabilities shall participate in the **development of a return-to-work process** which includes the development of an individual accommodation plan. Employees who require an accommodation in order to return to work shall submit a request for accommodation following the same process set out in this section of the policy for the development of an accommodation plan, and the process will include the requirements set out in Section 28 of the IAS Regulation and Section O (above).

Accessibility needs of employees and individual accommodation plans will be taken into account when managing an employee's performance, career advancement or opportunities for redeployment.

AS York's review of individual accommodation plans will be consistent with the procedure/approach for developing an IAP. There will be an initial review period for each employee at the time the IAP is created that is based on medical information provided regarding the employee's prognosis.

After the initial review, review periods will be established based on the individual employee's prognosis, and/or when the need arises. AS York recognizes that some employees will have disabilities that remain relatively stable for long periods of time while others will have disabilities that are expected to improve or become more severe within shorter periods of time.

The employee is obligated to notify AS York and provide updated medical information if the employee experiences a change in his/her disability that necessitates a review of the IAP.

Reviews may also be triggered when the employee changes to a new role or position, when the employee is having performance issues, when the employee requests further accommodation, and when AS York reviews this policy and related accessibility policies.

P. Performance Management and Career Development and Advancement

AS York will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required. (See Definitions in Appendix for performance management, career development and advancement)

Q. Return to Work Process

Although it is not mandatory, AS York will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) as set out in the *Ontario Human Rights Code*, *Workplace Safety & Insurance Act (WSIA)*, and the *AODA* and related *IAS* in order to

return to work.

AS York's goal is to ensure an early and safe return to work following any work and non-work related injury or illness. The return to work process will outline the steps AS York will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in Section 28 of the IAS regulation and the processes set out in Section O of this policy).

The return to work process does not replace or override any other return to work process created by or under any other statute e.g. the *WSIA*.

Please see Appendix M for Additional Return to Work Procedures.

R. Redeployment

In the event that AS York uses redeployment, AS York will take into account the accessibility needs of its employees with disabilities, along with individual accommodation plans, when redeploying employees with disabilities.

Individual accommodation plans will be consulted, as required.

S. Off-Street Accessible Public Parking

Types of Spaces and Access Aisles

AS York will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities:

- Type A – Parking space with a minimum width of 3.4 m; and
- Type B – Standard parking space with a minimum width of 2.4 mm.

Access aisles will be provided for all accessible parking spaces and will meet the requirements of the *Integrated Accessibility Standards*, section 80.35.

Minimums

AS York will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the *Integrated Accessibility Standards*, section 80.36.

Signage

AS York will ensure that the proper signage is provided for each accessible parking space. Type A parking spaces will have signage indicating van accessibility.

T. Obtaining Services

Service Counters

When constructing or replacing any service counters, AS York will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, section 80.41

Fixed Queuing Guides

When constructing new fixed queuing guides, AS York will ensure that they are made accessible to people with various disabilities in accordance with the *Integrated Accessibility Standards*, section 80.42

Waiting Areas

When constructing or redeveloping an existing waiting area, AS York will ensure that a minimum of 3% of the seating is made accessible. AS York will ensure that there will be at least one (1) accessible seat.

U. Maintenance

Although it is not mandatory, AS York will ensure that its multi-year accessibility plan addresses:

- Preventive and emergency maintenance procedures for the accessible elements in public spaces; and
- Procedures for temporary disruptions to accessible elements.

V. Exceptions

There may be times where it is not possible for AS York to meet all technical requirements as outlined within legislation. In these instances, AS York will strive to meet the requirements to the fullest extent to allow for accessible use with particular constraints as addressed in legislation.

PROCEDURES:

Related procedures and activities may be found in AS York's Multi-Year Accessibility Plan.

ROLES AND RESPONSIBILITIES:

CEO, Chair of Board, Members, Management Team:

Ensure that AS York complies with accessibility legislation as specified in the AODA Integrated Accessibility Standards.

CEO

1. Ensure coordination, implementation and monitoring of policy and reporting requirements
2. Include accessibility requirements in budget and planning process
3. Ensure that the recipients of AS York services have a feedback mechanism available to them so that they can provide input into the accessibility of the services provided. This feedback mechanism must be available in the agreed upon method of communication. i.e. in person, by phone, email, in writing, online
4. Direct feedback to appropriate program/stream/department as soon as possible upon receipt of feedback, utilizing the agreed upon method of communication.
5. Complete and file annual accessibility report as required.

Directors, Managers/Designates

1. Ensure implementation of the policy/ legislative requirements
2. Ensure that staff, students and volunteers are familiar with various disabilities and the various assistive devices that may be used by clients/persons with disabilities while accessing services. .i.e. email, TTY or Relay services, walkers, white canes, note taking devices
3. Ensure staff, students, volunteers and providers make every reasonable effort to understand and comply with the client's preferred method of communication or provide an agreed upon alternative. See attached Appendices C-E for alternate communication methods available for use at AS York.
4. Ensure that all staff, students, volunteers and providers are properly trained in interacting with people with disabilities who may utilize an assistive device or are accompanied by a service animal or a support person.

Manager/Program Manager at each Site

1. Provide notification as soon as possible of disruption of service, location or any technology that a person with a disability must use in order to access service e.g. closing of the office.
2. Advise webmaster to publish disruption of service notification on AODA section of AS York website.
3. Notice of disruption must list the reason for disruption, expected duration, contact information and if alternate services or facilities exist. i.e. Construction, power failure, pandemic. Refer to Disaster and Emergency Plan.

Staff, Students, Volunteers, and Providers

1. Make every reasonable effort to communicate with clients/persons with disabilities by offering various alternatives and make every reasonable effort to comply with the client's/person's preferred communication method or provide an agreed upon alternative.
2. Ensure people with disabilities who require a support person or service animal to have access to this support at all times and throughout premises or programs.
3. Ensure any person with a disability can utilize their own personal assistive devices for the purpose of accessing our services.

Communications Coordinator

1. Post notice on AS York website as soon as possible if there are any disruptions to service location or disruption to technology that a person with a disability would use in order to access service.
2. Notice must include reason for disruption, expected duration, contact information and any alternative services or facilities.

DEFINITIONS See Appendix

Signed and dated at Aurora, Ontario on this July 1st, 2016.

Loren Freid
Chief Executive Officer
Alzheimer Society of York Region

RELATED POLICIES /PROCEDURES/FORMS:

AS York Disaster and Emergency Plan
AS York AODA Client Feedback Form (see Appendix)
AS York Complaints Policy
AS York Emergency Response Guide
AS York Multi-Year Accessibility Plan.

REFERENCES:

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11, Ontario Regulation 429/07, Accessibility Standards for Customer Service). O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS
Changes to Ontario's Accessible Customer Service Standard: Toolkit (Customer Service Standards Toolkit ECP (2016-06-07)FINAL ontario.ca/accessibility
Accessible Customer Service Standard Changes Quick Reference Guide (Quick Reference Guide July 1, 2016 (003).pdf ontario.ca/accessibility
Ontarians with Disabilities Act, 2001
Ontario Human Rights Code
Compliance Manual: Accessibility Standards for Customer Service, Ontario Regulation 429/07, Ministry of Community and Social Services
Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07, Ministry of Community and Social Services
Accessibility Standards for Customer Service (Ontario Regulation 429/07)
Blind Persons' Rights Act, R.S.O. 1990, c. B.7, R.R.O. 1990, Reg. 58: GUIDE DOGS
Health Protection and Promotion Act, R.S.O. 1990, c. H.7, Ontario, R.R.O. 1990, Reg. 562: FOOD PREMISES
Ontario Regulation 31/05
Food Safety and Quality Act, 2001, S.O. 2001, c. 20, O. Reg. 31/05: MEAT
Dog Owners' Liability Act, R.S.O. 1990, c. D.16
Enabling Non-Profits Ontario Website and related products (e.g. Training Resource for Small Businesses and Organizations)
CHATS Accessibility for Ontarians with Disabilities (AODA) Customer Service Standards Policy, September 30, 2011

APPENDIX A DEFINITIONS

(Accessibility) Standard:

A “standard” explains an accepted way of doing something. It states what the requirements are, who has to meet them, and by when. In the AODA, an “accessibility standard” refers to standards made by regulation under section 6 of the Act.

Accessible Formats:

Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Accessible Taxicab:

A passenger vehicle that is an accessible vehicle and that is licensed as a taxicab by the municipality.

Accessible Vehicle:

A passenger vehicle or a bus, other than a school bus, that is:

- Designed or modified to be used for the purpose of transporting persons with disabilities and is used for that purpose, whether or not the vehicle is also used to transport persons without disabilities; and
- Operated by, for or on behalf of any person, club, agency or organization that holds itself out as providing a transportation service to persons with disabilities (either for compensation or not).

Agent:

An “agent” means someone who deals directly with members of the public to provide a program or service on behalf of AS York.

Assistive Devices:

“Assistive devices” means technical aids, communication devices, instruments or other medical aids modified or customized that are used to increase, maintain or improve how a person with a disability can function. Personal assistive devices are typically devices that people bring with them that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading. An assistive device may be as simple as a pen and paper used to assist a person to communicate. Other examples may include, but are not limited to, wheelchairs, walkers, white canes used by people who are blind or have low vision, note-taking devices, portable magnifiers, recording machines, assistive listening devices, personal oxygen tanks and devices for grasping. Assistive devices may accompany the client or already be on the premises, and are used to assist persons with disabilities in carrying out activities or in accessing AS York services.

Examples of some assistive devices that may or could be used in AS York facilities:

- Amplification System (Volume can be increased)
- Audible Signals (signals can be heard)

- Cane/White Cane
- Oxygen tanks
- Elevator
- Fire Alarm Strobe Lights (flashing lights)
- Fold down grab bars (used in washrooms)
- Monitor (larger screen)
- Portable Ramp (ramp can be carried)
- Power Door (the door opens automatically)
- Stair Lift
- TTY(Telephone Teletypes)
- Walker
- Wheelchair

Barrier

“Barrier” means 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, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice; (“obstacle”)

Beach Access Routes:

Routes that are constructed for public pedestrian use that provide access to public beaches from off-street parking facilities, recreational trails, exterior paths of travel and amenities.

Career Development and Advancement:

Section 31 (2) of the IAS regulation states that, “career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.

Communication Supports:

Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conventional Transportation Service Provider:

Refers to public passenger transportation services on transit buses, motor coaches or rail-based transportation that operate only in Ontario.

Conversion Ready:

An electronic or digital format that facilitates conversion into an acceptable format.

Dignity:

“Dignity” means service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.

Documented Consent:

“Documented consent” means that the person with a disability has given consent for a support person to attend a confidential interview and that the consent is documented by Regional staff on the consent form. The person’s consent can be written, verbal, by nod of a head or by other methods that confirm consent, depending on the type of disability.

Disability:

As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, a “disability” is:

- 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 mental impairment or a developmental disability.
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Environmental Mitigation:

Activities that are intended to address any negative effects on the environment caused by the standard.

Environmental Restoration:

Activities that will benefit the environment.

Equal Opportunity:

“Equal Opportunity” means service is provided to a person with a disability in such a way that they can access goods and services equal to that given of others.

Exterior Paths of Travel:

Refers to sidewalks and walkways designed and constructed for pedestrian travel and intended to provide a functional route from Point A to Point B, rather than a recreational experience.

Guide Dog:

A “guide dog” means a guide dog defined in section 1 of the *Blind Persons’ Rights Act, R.S.O. 1990, c. B.7* i.e. a dog trained as a guide for a blind person and having the qualifications prescribed by the regulation (R.R.O. 1990, Reg. 58: GUIDE DOGS).

Independence:

“Independence” means when a person with a disability is allowed to do things on their own without unnecessary help or interference from others.

Integration:

“Integration” means service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other clients, unless an alternate measure is necessary to enable a person with a disability to access goods or services.

Kiosk:

An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

Mobility Aid:

Refers to devices used to facilitate the transport, in a seated posture, of people with disabilities.

Mobility Assistive Device:

Refers to a cane, walker or similar aid.

Policies, Practices and Procedures:

“Policies, Practices and Procedures” refer to how a business or organization provides goods and services to people with disabilities.

Performance Management:

Section 30 (2) of the IAS states that “performance management” means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Recreational Trail:

A public pedestrian trail intended for recreational and leisure purposes.

Redeployment:

The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

Redeveloped:

A planned significant alteration to a public space. It does not include maintenance activities, environmental mitigation or environmental restoration.

Service Animal:

An animal is a “service animal” for a person with a disability if it is obvious 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 doctor or nurse confirming that the person requires the animal for reasons relating to the disability (as set out in the *Accessibility for Ontarians with Disabilities Act, 2005, Ontario Regulation 429/07, Accessibility Standards for Customer Service*).

Service Dog:

As set out in the *Health Protection and Promotion Act, Ontario Regulation 562* relating to food premises:

A dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability, or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Specialized Transportation Service Provider:

Refers to a designated public sector transportation organization described in paragraph 5 of Schedule 1 of the Integrated Accessibility Standards Regulation that provides specialized transportation services that operate only in Ontario.

Support Person:

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 or medical needs or with access to goods, services or facilities. (*Accessibility for Ontarians with Disabilities Act, 2005, O. Reg. 165/16, s. 16*).

Temporary Disruption:

A “temporary disruption” means a short term planned or unplanned disruption to facilities or services that people with disabilities usually use to get goods and services. Potential temporary disruptions may include, but are not limited to: evacuations due to fire, flood, road closures, mechanical failures, elevator out of service, and failure of telephone or technology equipment.

APPENDIX B COMMUNICATION GUIDELINES – TERMINOLOGY

The following is taken from the *Ministry of Community and Social Services*.
http://www/css/gpv/pm/ca/mcss/english/howto_choose.htm]

“Words can influence and reinforce the public’s perception of people with disabilities. They can create either a positive view of people with disabilities or an indifferent, negative depiction,” which means that the person is thought of in a negative way.

Here are some general tips that can help you communicate with or about people with all types of disabilities:

- Use *disability* or *disabled*, not *handicap* or *handicapped*.
- Remember to put people first. It is proper to say person with a disability, rather than disabled person.
- If you don’t know someone or if you are not familiar with the disability, it’s better to wait until the individual describes his/her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and your assumptions may be wrong.
- Never use demeaning or disrespectful terms such as *retarded*, *dumb*, *psycho*, *moron* or *crippled*.

APPENDIX C ALTERNATIVE METHODS OF COMMUNICATION

AS York staff, students and volunteers will consult the following list and offer to communicate with the client using one or more of the alternatives listed below:

- Large print (where possible) for people with low vision
- Offer phone service instead of in person
- E-mail
- Text messaging
- Print signs
- Handouts, brochures
- Handwrite the information
- Type the information back and forth
- Gestures, boards and symbols

AS York does not have access to the following communication services/devices:

- Audio format—cassettes or digital audio format
- Braille for some people who are blind or deaf-blind
- CCTV—Close Circuit Television for visually impaired
- Real time captioning services (on screen typing of what people are saying)
- Accessible interactive kiosk which might offer information or services in Braille or through audio headsets
- Computer with adaptive software, such as JAWS for those unable to read print
- Sign language interpreters
- Deaf-blind Interveners
- Pocket Talker for hearing impaired
- Screen readers (devices that speak the contents of the screen)
- Speech input systems (allow you to talk into a microphone to control the computer and enter text)
- Sign Language (Note: currently available in a limited capacity)
- Teletypewriter (TTY) which allows callers to send typed messages across phone lines
- Easy to read, simplified summaries of material for people with developmental or intellectual disabilities
- Bell Relay Service for hearing impaired phone customers-- Bell Relay service enables callers who are deaf, hard of hearing or have speech disabilities to communicate with the hearing community via the telephone and a device called a TDD/TTY, or text telephone. A specially trained Relay Service operator reads the message typed by the TDD/TTY user to the hearing person and relays a reply back.

APPENDIX D

COMMUNICATION GUIDELINES – SERVICE TIPS

The following “tips” will help to ensure that clients are served in ways that take the person’s disability into account.

Physical Disabilities

Physical disabilities include a range of ways that physically limit a person’s body from carrying out daily activities. Physical disabilities can range from minor difficulties in moving or coordinating one part of the body, through muscle weakness, tremors and paralysis.

People may be born with physical disabilities, such as Muscular Dystrophy, or disabilities may occur at a later point in time, such as tendonitis. Not everyone with a physical disability uses a wheelchair. A person with a spinal cord injury might use crutches, while someone with a heart condition or severe arthritis might have difficulty walking longer distances. A person may use a service animal to help with vision or hearing loss. Service animals are also trained to alert individuals about oncoming seizures.

A physical disability may affect a person’s ability to:

- Perform manual tasks such as holding a pen, turning a key or grip a door knob
- Move independently
- Control the speed or coordination of movements
- Reach, pull or use objects
- Have strength or stamina

Tips for serving clients who have physical disabilities:

- Speak normally and directly to the client, not to the support person.
- If you are not sure which person is the client, take your lead from the person using or requesting the service, or ask.
- People with physical disabilities often have their own way of doing things. Ask if the client would like help.
- If a person is accompanied by a service animal, avoid touching or addressing the animal, as it is a working animal and must pay attention at all times.
- If you are not sure whether the animal is a pet or service animal, ask the person.
- Wheelchairs and other mobility devices (e.g. canes) are part of a person’s personal space. Don’t touch, move or lean on them without permission.
- If you have permission to move a person’s wheelchair, don’t leave them out of reach, or in an awkward, dangerous, or undignified/inappropriate position, such as facing a wall or in the path of opening doors.
- If you need to have a lengthy conversation with someone who uses a wheelchair or scooter, consider sitting so that you can make eye contact at the same level.
- Provide your client information about accessible features that are nearby that are appropriate to their needs e.g. automatic doors, accessible washrooms, public phones with TTY service.

- Keep ramps and corridors free of clutter.
- If a counter is too high or wide, step around it to provide service.
- Provide seating for clients that cannot stand in line.
- Be patient. Clients will tell you their needs.

Deaf, Deafened and Hard of Hearing

Hearing loss may cause problems in distinguishing certain frequencies, sounds or words. Those who have hearing loss may be deaf, oral deaf, deafened, or hard of hearing. These terms are used to describe different levels of hearing and/or the way a person's hearing has been diminished or lost.

A person who is deaf, deafened, or hard-of-hearing may be unable to:

- Use a public telephone
- Understand speech in noisy places
- Pronounce words clearly enough to be understood by strangers.

Tips for serving clients who have hearing disabilities:

- Attract the client's attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand.
- Ensure that you are in a well-lit area where the person can see your face and read your lips
- If the person uses a hearing aid/speech amplification device, reduce the background noise or move to a quieter area.
- If necessary, ask if another way to communicate would be easier i.e. passing notes back and forth
- Always ask how you may help. Do not shout. Speak clearly.
- Be clear and use specific information when giving directions, and repeat or rephrase if necessary. Make sure you have been understood.
- Face the person and keep your hands and other objects away from your face and mouth.
- A person who is deaf may use a sign language interpreter to communicate. Always direct your attention to the person who is deaf, not the interpreter.
- Any personal (e.g. financial) matters should be discussed in a private room to avoid other people overhearing.
- Do not touch or address a service animal. It is working and has to pay attention at all times.

Deaf-Blindness Disabilities

Deaf-blindness disabilities are a combination of hearing and vision loss. A person who is deaf-blind may have some degree of both hearing and vision loss. A person who is deaf-blind has may have great difficulty getting information and performing daily activities. Deaf-blindness makes communication, learning, orientation and mobility difficult. People who are deaf-blind communicate using various sign language systems, including Braille, telephone devices, communication boards or a combination of these systems. Many people who are deaf-blind use the services of an Intervener or professional support person, who help the person understand what

is being said and seen, give information, and act as a sighted guide.

Tips for serving clients who are deaf-blind:

- Do not assume what a person can or cannot do. Some people who are deaf-blind have some sight or hearing, while others have neither.
- Direct your attention to the client, not the Intervener.
- A client who is deaf-blind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them.
- Do not touch or address a service animal. It is working and has to pay attention at all times.
- Never touch a person who is deaf-blind suddenly or without permission unless it is an emergency.
- Understand that communication can take some time. Be patient.

Vision Disabilities

A person with a vision disability has difficulty seeing clearly. Loss of vision can restrict a person's ability to read, locate landmarks, or see hazards. Vision disabilities can include a loss of side vision, or a lack of central vision, which means the person cannot see straight. Very few people are totally blind. Many have limited vision such as tunnel vision, and can only see ahead. Some can see the outline of objects while others can see the direction of light. Vision loss may result in:

- Difficulty reading or seeing faces
- Difficulty moving around in unfamiliar places
- Difficulty seeing colours or distances
- A narrow field of vision
- The need for bright light or contrast
- Night blindness

Tips for serving clients who have vision disabilities:

- Do not assume that the person cannot see you
- Speak directly to the person.
- Identify yourself as you approach, and before making physical contact.
- Do not touch or address a service animal. It is working and has to pay attention at all times.
- Verbally describe the setting, form and location as necessary.
- Offer your arm/elbow to guide the person if necessary. Do not grab or pull.
- Never touch the client without asking permission, unless it is an emergency.
- Do not leave the client in the middle of a room. Show them to a chair, or guide them to a comfortable location.
- Ask the person if they would like you to read any printed material out loud to them, such as a description of services or a fee schedule.
- Do not walk away without saying good-bye.

Intellectual Disabilities

Intellectual disabilities can affect a person's ability to think, learn, reason, communicate, do everyday physical activities, and live independently. Disabilities may be caused by the person's genetic makeup, such as Down's Syndrome, or exposure to a toxic substance, such as Fetal Alcohol Syndrome, or brain trauma or psychiatric disorders. You may not know that a person has an intellectual disability. A person with an intellectual disorder may have difficulty with:

- Understanding spoken and written information
- Understanding concepts
- Being aware of sensory information
- Memory.

Tips for serving clients who have an intellectual or developmental disability:

- Do not assume what a person can or cannot do.
- Remember that the person is an adult and unless you are informed otherwise, can make their own decisions.
- Speak directly to the client, not to a companion or attendant.
- Use clear, simple language.
- Provide one piece of information at a time.
- Be prepared to explain and provide examples regarding information.
- Be patient and verify your understanding of what they need.
- If you can't understand what is being said, don't pretend. Just ask again.

Speech Disabilities

Speech disabilities involve the partial or total loss of the ability to speak. Hearing loss, cerebral palsy, or other conditions may make it difficult for a person to pronounce words and may cause slurring. Some persons with severe difficulties use assistive devices such as a communication board.

Typical disabilities include problems with:

- Pronunciation
- Pitch and loudness
- Hoarseness or breathiness (breathing difficulties)
- Stuttering or slurring

Tips for serving clients with speech or language disabilities:

- Do not assume that a person with a speech impairment has another disability.
- If possible, talk in a quiet environment.
- Give the person your full attention. Don't interrupt or finish their sentences.
- Ask them to repeat as necessary, or to write their message.
- Where appropriate, ask questions that can be answered 'yes' or 'no.'
- Verify your understanding of what they need.
- Have patience, respect and willingness to find a way to communicate.

Learning Disabilities

Learning disabilities include a range of disorders e.g. dyslexia, that affect how a person acquires, retains, understands and processes spoken and non-spoken information. People with a learning disability have average or above average intelligence, but take in and work through information and express their knowledge in different ways. Learning disabilities can result in difficulties in:

- Reading
- Problem solving
- Time management
- Finding the way
- Processing information.

Tips for serving clients with a learning disability

- A learning disability may become apparent if a person had difficulty reading or understanding the information that you provide.
- Try to provide information that takes the client's disability into account e.g. some may have difficulty with numbers/math, or others may find it difficult to understand written words.
- Be patient, as it may take longer for a person with a learning disability to process, understand, and respond to information.

Mental Health Disabilities

Mental illness disabilities result from a range of mental illnesses and disorders. Mental health disability is a broad term for many disorders that can range in severity. For example, a person might experience anxiety, mood swings, phobias, panic disorder, or even hallucinations. There are three main types of mental illness:

- Anxiety
- Mood
- Behavioural

Mental health issues can affect a person's ability to think clearly, concentrate, or remember. People with mental illness may seem edgy or frustrated, act forcefully, appear to be pushy or abrupt, be unable to make a decision, start laughing or get angry for no apparent reason.

Tips for serving clients with a mental health disability

- Treat the person with the same respect and consideration that you give to others
- Maintain a confident, calm and reassuring manner
- If the person appears to be in crisis, ask the person to tell you the best way to help

Smell Disabilities

Smell disabilities may involve not being able to smell odours or being overly sensitive to odours and smells. A person with a smelling disability may have allergies to certain odours, scents or chemicals or may be unable to identify dangerous gases, smoke, fumes and spoiled food.

Touch Disabilities

Touch disabilities may affect a person's ability to sense texture, temperature, vibration or pressure. Touch sensations may be reduced or heightened resulting in a hypersensitivity to touch, temperature, or the opposite, numbness and the inability to feel touch sensations.

Taste Disabilities

Taste disabilities may limit the experience of the four main ways we taste: sweet, bitter, salty and sour. A person with a taste disability may be unable to identify spoiled food or unpleasant substances.

Other Disabilities

Other disabilities result from a range of other conditions, accidents, illnesses and diseases including ALS, asthma, diabetes, cancer, HIV/AIDS, being overly sensitive to substances in the environment, disorders that make a person have seizures, heart disease, stroke and joint replacement.

Disabilities are not always visible or easy to identify.

APPENDIX E ADDITIONAL PRACTICES PROCEDURES, AND EXAMPLES

These practices will help to ensure that clients with disabilities have the same chance as others to access services. Responding to client needs is not limited to the examples provided. Common sense, patience, respect and a willingness to find the best way to help should be used when serving clients with disabilities.

Match Communication to Type of Disability

Communicate with a person with a disability in a way that takes the person's disability into account. Where possible, ask the person directly how to best communicate with them. It may be necessary to offer the information in another format such as in large print, on CD or by use of Braille. If using a telephone is not the best way for a client to talk or is not available, staff may offer to communicate information to a client in person, by TTY or similar technology, email or in writing.

Service Animals

Service animals are allowed to go with any person with a disability while receiving services offered by AS York. Where an animal is not allowed by law, other arrangements must be explored in order to provide service to a person with a disability. For example, if a guide dog is not allowed by law in a particular area, a person with low vision or no vision might need someone to guide him or her while the animal waits in a safe location. Another option is to bring the goods and services to the person in a part of the building where the animal is allowed. Always discuss solutions with the client. Where a service animal may affect the health and safety of other clients, staff should discuss the situation with both clients and make every effort to meet the needs of both people. For example, if a person using a guide dog goes to a meeting where another person is allergic to dogs, a solution that both agree with should be made. Some solutions include seating the two people at opposite ends of the room or offering different service dates where possible.

Support Persons

Support persons are allowed to go with any person with a disability while receiving AS York services. Some services, however, may be confidential, such as an intake interview or assessment. Confidentiality of clients must be protected. If a person with a disability uses a support person and is having a confidential interview/assessment, the person with a disability may need to provide documented permission for the support person to be in the meeting.

Note: AS York obtains consent in these situations. For example, if a person who is deaf, deafened or hard of hearing brings a Sign Language Interpreter to a confidential intake interview, staff should get documented consent from the client for the Sign Language Interpreter to go into the interview.

AS York may require a person with a disability to have a support person when on the premises, but only if a support person is needed to protect the health or safety of the person with a disability or the health or safety of others on the premises. The decision

on this need will be made based on level of risk. For example, AS York may request a person who is blind or has low vision to bring a support person to guide them through a facility when hazards to the person, such as debris on the floor, may exist.

Admission Fees

AS York is required to let people know their practice of charging fees to support persons. If a participant fee is charged, such as an admission or registration fee, notice must be given ahead of time about the amount, if any, that the accompanying support person must pay. Notice regarding fees for support persons must be clearly posted. This may involve posting a sign or including the information in a printed document or on the website.

Note: This is not relevant at this point in time.

Temporary Disruptions

If there is a temporary disruption in facilities or services used by people with disabilities, notice of the disruption must be given as soon as possible. Some examples of temporary disruptions may include, but are not limited to evacuations due to fire, flood, etc., road closures, mechanical failures, elevator out of service, services moved or cancelled, failure of telephone or technology equipment. Notice must be given as soon as possible. This may include posting the information in obvious places on the premises (for example, on entrance doors, service counters, on bulletin boards, etc.), on the website, voicemail messaging, or by reasonable methods. Consider which people with disabilities will be most affected by the disruption and make sure the information is communicated to them in a way which matches their needs. For example, if an elevator is temporarily unavailable, post a sign at all entrances and at a height that will allow a person using a wheelchair or scooter to read it. Other options could include providing a map with directions to another elevator or accessible washroom, or asking clients to let AS York know they are coming ahead of time so that other services can be provided, if possible.

Feedback Process

AS York will collect and respond to feedback about its provision of services to clients with disabilities, using evaluation processes that are already in place. Feedback should follow the AS York client service strategy, standards, and processes. At a minimum:

- If feedback is received by a AS York site/ office not providing the service, it must be sent to the correct site/ office, who should note receipt of the feedback.
- If action is needed, it must be done within a reasonable period of time after the first note of receipt.
- If the situation is urgent or requires faster action, AS York must work to meet the urgency.
- If the situation is complex, AS York must work out timelines together with the client to find a solution.

The Manager/Program manager will be the contact person at each site.

**APPENDIX F
SAMPLE SERVICE DISRUPTION NOTICES**

Sample 1

Notice of Temporary Disruption of Service

Dear Clients,

Elevator **[number or location e.g. Elevator #1, at the end of this hall, etc.]** will be out of service from:

Day Month Year to Day Month Year for **[insert reason for disruption e.g. routine maintenance, repair, etc.]**

To access the upper levels of this building please use Elevator **[number or location e.g. Elevator #1, at the end of this hall, etc.]**

We apologize for any inconvenience.

If you have questions or concerns, please call **insert contact information including extension.**

Thank you.

Management

Sample 2

Notice of Temporary Disruption of Service

Dear Clients,

The **[insert name of program or service]** has been **Cancelled/postponed/moved** effective **Day Month Year to Day Month Year** due to **[insert reason for cancellation, postponement, move e.g. inclement weather, building maintenance, emergency etc.]**.

For **[insert name of program or service]** please go to **[insert description of alternate facilities or services, if available]**.

We apologize for any inconvenience.

If you have questions or concerns, please call the **[insert name of program or service contact information including extension]**

Thank You.

Management

Sample 3

Notice of Temporary Disruption of Service

Dear Clients,

The accessible washroom will be out of service from **Day Month Year to Day Month Year** for **[insert reason for disruption e.g. routine maintenance, repair, etc.]**

Please use the accessible washroom which is located **[location e.g. at the end of this hall, etc.]**

We apologize for any inconvenience.

If you have questions or concerns, please call **insert contact information including extension.**

Thank You.
Management

APPENDIX G
FORM FOR OBTAINING CLIENT FEEDBACK
Accessibility for Ontarians with Disabilities Act (AODA)
Customer Service Feedback Form

We are committed to ensuring that people with disabilities can access our programs and services in the same place and in a similar way to our other clients. We will make every effort to provide acceptable methods of communication and accessible information to meet client needs.

We value your feedback regarding our programs and services. Please complete the form and submit it in person to reception, to our staff, call, or mail it to the address below.

Iftexhar Hossain
Director of Finance & Support Services
2-240 Edward St.
Aurora, ON L4G 3S9
Tel: 905-726-3477 ext. 224
Email: ihossain@alzheimer-york.com

Please tell us the date, time and location of your visit:

Date:

Time:

Location:

1. Were you satisfied with the customer service we provided you?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
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Comments:

2. Was our customer service provided to you in an accessible manner?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
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Comments:

3. Did you experience any problems accessing our goods and services?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
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Comments:

4. Is there anything we could do to make it easier to access our services?

Comments:

5. Do you have any other comments or feedback that you would like to tell us?

Please provide your contact Information (Optional)

Name: _____

Phone Number: _____

Email: _____

Thank-you for your feedback!

APPENDIX H
RECORD OF CLIENT FEEDBACK
Record of Client Feedback

Date feedback received:
Name of client **[optional]**:
Contact information (if appropriate)*:

Details:

Follow-up:

Action to be taken:

Staff member:

Date:

***Note:** This information is collected and used in accordance with our Personal Health Information Policy.

**APPENDIX I
NOTICE ON FEEDBACK PROCESS**

Dear Clients,

We strive to improve accessibility for our clients with disabilities. We welcome your feedback. Please call 905-xxx-xxxx or email info@alzheimer-york.com to share your comments, or to request a copy of our accessibility policy.

Thank you.

Management


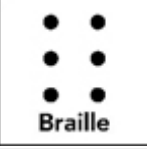
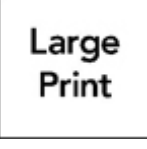



**APPENDIX J
BARRIERS AND SOLUTIONS**

Possible Barriers	Possible Solutions
Vision loss	
Staff are not aware of the need to describe goods or services when a person cannot read a sign.	<ul style="list-style-type: none"> ▪ Make it standard practice to describe to clients the goods or services offered if they are unable to view them due to vision loss
Deaf, deafened, oral deaf or hard of hearing	
Telephone services not accessible for clients who are Deaf, deafened, oral deaf or hard of hearing	<ul style="list-style-type: none"> ▪ Incorporate use of TTY and Relay services in your telephone service policies. ▪ Ensure staff are trained in, and practice using, TTY and Relay services.
Staff are not aware of the need to paraphrase or repeat more slowly what is said to clients when the client has not understood the message.	<ul style="list-style-type: none"> ▪ Establish the practice of paraphrasing and repeating communications more clearly to clients upon request or using other means such as passing notes back and forth.
Speaking to clients with hands covering the mouth which does not allow for lip-reading	<ul style="list-style-type: none"> ▪ Establish the practice of speaking clearly and making sure that nothing is covering the mouth when communicating with clients who lip-read.
Loud music and poor acoustics, making hearing difficult for people using hearing aids	<ul style="list-style-type: none"> ▪ Establish the practice of having pen and paper available and communicate through note-writing.
Intellectual/Developmental disability	
Use of complicated or technical language in client service	<ul style="list-style-type: none"> ▪ Establish the practice of using plain language and avoid technical language when communicating.
Ignoring clients who are more reserved or afraid to ask for help	<ul style="list-style-type: none"> ▪ Establish the practice of building in extra time to deal with clients who need it and adjust the availability of other staff to help out as needed.
Learning disability	
Providing complicated documents to clients without explanation or opportunity to discuss or ask questions	<ul style="list-style-type: none"> ▪ Establish the practice of discussing and explaining any documentation provided to clients.

Possible Barriers	Possible Solutions
Employees who are not flexible in offering alternative communication strategies or adequate time in providing service	<ul style="list-style-type: none"> ▪ Make it a standard procedure to break up lengthy conversations into a series of shorter ones. This may assist clients who need additional time to process certain types of information.
Mental health disability	
Negative stereotypes about people with mental health disabilities resulting in disrespectful or impatient treatment.	<ul style="list-style-type: none"> ▪ Add a training component to the regular training that staff receive on the needs of people with mental health disabilities. ▪ Make it a standard procedure to break up lengthy conversations into a series of shorter ones and speak more slowly so that some clients will not feel overwhelmed with the information. This may help to prevent anxiety in some clients.
Physical disability	
Failure of staff to offer assistance when some services require particular agility and/or motor skills	<ul style="list-style-type: none"> ▪ Develop a policy that requires staff to assist clients in handling or reaching goods when requested.
Failure of staff to set aside convenient seating (close to rest rooms or exits)	<ul style="list-style-type: none"> ▪ Establish the practice of setting aside convenient seating for people with physical disabilities.
Speech impairment	
Verbal speech is the only form of communication used to interact with clients.	<ul style="list-style-type: none"> ▪ Develop a policy that requires staff to have pen and paper on hand and communicate through note-writing when requested to do so.

**APPENDIX K
UNIVERSAL SYMBOLS OF ACCESSIBILITY**

The following symbols can be used to promote accessibility of places and services.

Universal Symbols of Accessibility	
	<p>International Symbol of Accessibility (ISA) This is probably the most recognizable symbol of accessibility. The wheelchair symbol should only be used to indicate access for individuals with limited mobility, including wheelchair users. For example, the symbol is used to indicate an accessible entrance, bathroom or that a phone is lowered for wheelchair users.</p>
	<p>Braille Symbol This symbol indicates that printed matter is available in Braille, including exhibition labelling, publications and signage.</p>
	<p>Accessible Print The symbol for large print is 'Large Print' printed in 16-20 point font size. In addition to indicating that large print versions of books, pamphlets, museum guides and theatre programs are available, you may use the symbol on conference or membership forms to indicate that print materials may be provided in large print.</p>
	<p>Assistive Listening Systems This symbol is used to indicate that assistive listening systems are available for the event. The systems may include infrared, loop and FM systems.</p>
	<p>Sign Language Interpretation This symbol indicates that Sign Language Interpretation is provided for a lecture, meeting, performance, conference or other program.</p>
	<p>Closed Captioning (CC) This symbol indicates that a television program or videotape is closed captioned for deaf or hard of hearing people (and others).</p>

APPENDIX L
UNIVERSAL SYMBOLS OF ACCESSIBILITY

In addition to the *Blind Persons' Rights Act, R.S.O. 1990*, the following legislation also applicable to AS York's AODA policy and procedures.

Food Safety and Quality Act 2001, Ontario Regulation 31/05:

Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. The Act makes an exception (see Section 44) for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling or storing of animals or parts of animals.

Health Protection and Promotion Act, Ontario Regulation 562 Section 60:

The Act normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored or offered for sale. The Act allows guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, R.S.O. 1990, c. D.16

Section 11 of this Act relates to Municipal legislation; if there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is the most restrictive in relation to controls or bans on these breeds prevails.

APPENDIX M ADDITIONAL RETURN TO WORK PROCEDURES

These return to work processes outline steps that AS York will take to facilitate an employee's return to work, in addition to the use of **documented individual accommodation plans** (as described in Section 28 of the AODA IAS regulation) and as set out in this policy in Section O. for **Documented Individual Accommodation Plans**.

AS York will and its senior management team will:

- Make every effort to ensure that the rehabilitation/return-to-work process begins as soon as practicable so that the employee's maximum physical, psychological and social potential can be restored
- Educate all employees about what to expect when an injury/illness occurs
- Include workplace rehabilitation/return-to-work in employee orientation (as described in the AODA IAS policy)
- Ensure that all employees are aware that, in the event of injury or illness, they will be consulted to develop their rehabilitation and return-to-work plan, and that they will be participating in workplace rehabilitation programs as appropriate
- Protect employee privacy and inform employees that AS York will respect the confidential nature of medical information, both verbal and written
- Maintain confidentiality of information received including appropriate storage and handling
- Develop a rehabilitation/return-to-work plan in consultation with the employee, manager, medical practitioner, rehabilitation service, and other professionals as appropriate
- The plan will include:
 - agreed time frames
 - goals
 - a list of duties and restrictions
 - individual accommodation required (e.g., adjustments to duties, work stations, work hours)
 - communication support and assistive technologies required
 - hours to be worked
 - details of training required
 - anticipated time frame of plan
 - details of pay during the period
 - formal review every month (or sooner if required)
- Provide the plan in accessible format
- Ensure to the extent possible that duties assigned to an employee for a suitable duties program are meaningful and have regard to the objective of the employee's rehabilitation and return-to-work and individual accommodation plans
- Implement a rehabilitation and return-to-work plan, providing suitable duties where practicable, with the aim of returning the employee to normal duties
- Consult with employees and, where appropriate, treating medical practitioners to

ensure that rehabilitation/return-to-work procedures operate effectively and safely

- Consult and advise on the injured or ill employee's capabilities, and negotiate workplace adjustments, support and individual accommodation (e.g., communication, assistive technology, flexible work schedule) in advance of their return to work where appropriate and with the necessary consent of the returning employee
- Monitor the employee's progress in relation to suitable duties
- If an employee is not progressing and achieving goals as agreed in the rehabilitation and return-to-work plan, the manager (and medical practitioner) will identify areas of concern, seek appropriate additional advice as indicated and amend the plan
- Conduct a return-to-work meeting in accordance with the disability management process, policies and procedures
- Review employees who return to work with accommodation/restrictions to assess progress and fitness to return to normal duties. Review ongoing restrictions/absences on a monthly basis or at other intervals as required by the employee's individual circumstances
- Maintain accurate records of the employee's hours worked and performance reviews
- Conclude workplace rehabilitation and the return-to-work plan when the employee resumes all the prescribed duties for the role to which they were appointed.

- Where there is a disagreement over the proposed plan offered, discussions will take place with the employee, manager, and medical practitioner to seek a resolution.

- Disagreements regarding a medical treatment can be referred to an independent medical practitioner or occupational health consultant in appropriate circumstances.

- If an employee is unable to return to work in his or her former position, a number of alternative arrangements will be discussed with the ill/injured employee. These may include, but are not limited to, retraining, redeployment, accessing short- or long-term disability benefits or retirement.

- Human Resources will:
 - Assist the injured/ill employee to remain at work or return to work, consistent with medical advice
 - With the employee's consent, obtain accurate information about the medical condition and limitations that apply to the particular employee
 - Obtain written consent from the employee to communicate with health care professionals involved in the employee's care (when applicable)
 - Obtain as much information as possible about the employee's role and

the essential and marginal tasks of their job, what is required for the employee to get to and from the workplace, how the employee accesses facilities in the workplace, washrooms, kitchen, etc.

- Obtain the support of the treating medical practitioner and the employee in completing a Functional Abilities Form
 - Provide confidential support and counselling services where available and/or appropriate to employees who are affected by personal or work-related issues
 - Communicate this policy and what to expect when an illness or injury occurs to employees in orientation and on a case-by-case basis as appropriate.
 - Send a workplace rehabilitation/return to work evaluation to each employee who was involved in a rehabilitation/return-to-work plan.
- Rehabilitation professionals (with the consent of employees) will:
 - Provide timely intervention, based on assessed needs
 - Engage in two-way communication with the source of referral on an ongoing basis in relation to strategies required and/or recommendations
 - Provide reports as indicated or requested in relation to the employee's progress
 - Participate in case conferences as required
 - When applicable and appropriate, assess aspects of the workplace regarding contributing factors to the employee's condition, and make recommendations
 - Employees will be in breach of their obligations where they:
 - Are considered to gain minimal or no benefit from continued workplace rehabilitation and return-to-work processes
 - Fail to engage in rehabilitation and return-to-work processes
 - Fail to comply with recommendations of the rehabilitation and return-to-work plan or any other recommendations made by the rehabilitation and return-to-work team
 - Withdraw from the disability management program and rehabilitation and return-to-work plan
 - Employees will:
 - Prevent work-related injury and illness by complying with the requirements of the *Ontario Occupational Health and Safety Act* and with health and safety policies, procedures, practices, and protocols and legislation appropriate to their scope of work
 - Seek appropriate medical treatment (e.g., first aid) in the event of a work-related injury
 - Actively participate in rehabilitation/return-to-work processes in order to resume normal duties as soon as practicable after illnesses or injury in accordance with medical advice
 - Where possible, maintain regular contact with the manager/designate with particular emphasis on informing them of any deterioration in condition or unexpected issues

- Report any injury occurring at work as soon as possible to the manager/designate, follow incident reporting procedures, and participate in any follow-up investigation
 - Advise treating medical practitioners of the availability of a rehabilitation/return-to-work process and ask them to complete a Functional Ability Form
 - Encourage co-workers to support injured/ill employees and informing them of the progress of the rehabilitation/return-to-work process on a “need to know” basis with the injured/ill employee’s consent
 - Encourage co-workers to be actively involved in a positive manner wherever possible to support the rehabilitation/return-to-work process
- Management and staff will also observe related health and safety procedures and protocols as appropriate e.g.:
 - All work-related injuries and illness must be reported to the immediate manager/designate. All employees with non-work related injuries and illness must report their need for accommodation to their immediate manager/designate.
 - If needed, immediate first aid or medical attention must be provided by the designated first aid attendant
 - The manager/designate should inform the Joint Occupational Health and Safety Committee (JOHSC) or representative regarding the employee’s illness/injury, if appropriate or required by law, in accordance with the disability management program and this policy or any health and safety policies.
 - In the event of a work-related injury or illness, the immediate manager/designate shall ensure that a form 7 is filed with the WSIB and where a critical injury (injury of a serious nature that, (a) places life in jeopardy, (b) produces unconsciousness, (c) results in substantial loss of blood, (d) involves the fracture of a leg or arm but not a finger or toe, (e) involves the amputation of a leg, arm, hand or foot but not a finger or toe, (f) consists of burns to a major portion of the body, or (g) causes the loss of sight in an eye) has occurred, the Ministry of Labour will be contacted immediately and the scene of the accident will not be disturbed other than to save life or relieve human suffering; maintain an essential public utility service or a public transportation system; or prevent unnecessary damage to equipment or other property.
 - The manager will be designated to interview the employee (if required).
 - Where further information is required, the JOHSC or representative will liaise with the employee's medical practitioner (with appropriate consent). The employee's medical practitioner may be requested to provide a medical certificate and fill out a Functional Abilities Form.
 - Referral will be made to the relevant medical professional or rehabilitation services (e.g., physiotherapy, occupational therapy, psychological and counselling services).
 - A rehabilitation and return-to-work plan with agreed time frames will be developed (see above)
 - The manager/designate, and JOHSC or representative will maintain good communications between all parties involved, including providing feedback on

the rehabilitation and return-to-work plan while maintaining confidential and up-to-date records of the progress of the plan.