

AODA Accessibility Policy



REV Date: **14-MAY-2025**

REV Level: **C**

Doc No.: **HS-AD02**

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PURPOSE:

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 191/11* under the *Accessibility for Ontarians with Disabilities Act, 2005* and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All services provided by Clear Medical Imaging shall follow the principles of dignity, independence, integration and equal opportunity.

SCOPE:

Applies to all Employees of Clear Medical Imaging (Clear).

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1) DEFINITIONS:

- a. **Clear** = Clear Medical Imaging (2324317 Ontario Ltd)
- b. **Disability**: the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:
 - i) Any degree of physical disability, infirmity, malformation or disfigurement.
 - ii) A condition of mental impairment or developmental disability.
 - iii) A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
 - iv) A mental disorder.
 - v) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.These definitions include disabilities of all different severity, visible as well as non-visible disabilities, and disabilities, the effects of which may come and go.
- c. **Guide Dog**: a highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety, and increased independence for people with a visual disability.

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- d. **Service Dog:** as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:
 - i. it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability.
 - ii. 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.
- e. **Service Animal:** an animal used by a person with a disability for reasons relating to his or her disability. The person may provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability or it may be readily apparent.
- f. **Support Person:** a person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.
- g. **Assistive Device:** a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities such as moving, communicating, lifting, remembering and/or reading. Typically, visitors will bring their personal assistive devices with them.

2) POLICY:

Clear Medical Imaging is committed to excellence in serving all customers including people with disabilities. Clear will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the Accessible Customer Service principles of dignity, independence, integration and equal opportunity.

People with disabilities will be given equal opportunity to obtain, use and benefit from the services and facilities and/or employment provided by Clear.

3) PROCEDURES

Clear will meet its duties and responsibilities under *Ontario Regulation 191/11* by adhering to the following principles and practices:

a. Training

Clear will ensure that all Employees receive training as required by the *Accessibility Standards for Customer Service* and by the *Ontario Human Rights Commission*. All new Employees will receive the training as part of their orientation. Any Employee who does not pass the required quiz will receive additional individual instruction to enable successful completion.

The training shall include:

- i. A review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005*
- ii. The requirements of the *Accessibility Standards for Customer Service (Ontario Regulation 191/11)*
- iii. The requirements of the *Ontario Human Rights Code, 1990*
- iv. How to interact and communicate with persons with various types of disabilities
- v. How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or support person
- vi. What to do if a person with a disability is having difficulty accessing Clear's services
- vii. Instructions on Clear's policies, procedures and practices pertaining to the provision of services to persons with disabilities.
- viii. Records shall be kept indicating the date and training provided.

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- b. **Assistive Devices:** Clear will ensure staff is trained and familiar with various assistive devices that may be used by patients or anyone visiting our facilities who has disabilities while accessing our services.
- c. **Communication:** We will communicate with people with disabilities in respectful ways that consider their disability. When Employees are unsure about the best approach, they are encouraged to ask the person politely and not assume how they can best communicate with them.
- d. **Service Animals:** Clear welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public, subject to:
- i. **Recognizing a Guide Dog, Service Dog or Serviced Animal:** If it is not readily apparent that the animal being used by the visitor/patient for reasons related to his or her disability, a Clear Employee may respectfully ask the individual why they are being accompanied by an animal. *Note: Staff members should never ask what type of disability the service animal is being used for or suggest that the individual does not "look like" they have a disability.* Clear reserves the right to request verification from the visitor/patient, which may include:
 - 1. A letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability.
 - 2. A valid identification card signed by the Attorney General of Canada; or,
 - 3. A certificate of training from a recognized guide dog or service animal training school. For example, a Clear Employee may ask "Do you have supporting documentation, such as an identification card from a training school or a letter from a health professional, showing you require a service animal for a disability?"

If the animal does not appear to be a Service Animal, the Employee is to contact their Direct Manager, who may be required to advise the individual that the animal cannot remain in the Clear Medical Imaging facility, and if warranted, assist with rescheduling the patient's appointment.
 - ii. **Allergies:** If a health and safety concern presents itself, for example in the form a severe allergy to the service animal, Clear will make all reasonable efforts to meet the needs of all individuals.
 - iii. **Care and Control of the Animal:** The visitor who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.
- e. **Support Persons:** A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises, subject to:
- i. There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, Clear Medical Imaging will make every reasonable attempt to resolve the issue.
 - ii. In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

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- f. **Notice of Temporary Disruption:** In the event of a planned or unexpected disruption to services or facilities for visitors with disabilities, Clear will notify visitors promptly and directly through the notices posted near the affected areas. Alternative services and assistance, if available, will be provided where possible. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.
- i. **Notifications will Include:** In the event a notification is required, the following information may be included unless it is not readily available or known:
- Services that are disrupted or unavailable
 - Reason for the disruption
 - Anticipated duration
 - A description of alternate services or options
- ii. **Notification Options:** If/when disruptions occur, Clear will provide notice by:
- Posting notices in conspicuous places, including at the point of disruption, at the main and accessible entrances (of the applicable clinic), and on the company webpage as well as other applicable company social media sites;
 - Contacting patients with appointments;
 - Verbally notifying patients who are phoning to book an appointment; or,
 - By any other method that may be reasonable under the circumstances.
- g. **Feedback Process:** Patients or visitors who wish to provide feedback on the way Clear provides services to people with disabilities can:
- i. Verbally discuss their concerns;
 - ii. Complete a Customer Feedback Form (HS-AD04); or,
 - iii. Send an email directly to info@clearimaging.ca.
- All feedback will be directed to the Manager responsible for addressing the feedback. Patients can expect to be contacted within three (3) business days. Complaints will be addressed according to Clear's regular complaint management procedures.
- h. **Modifications to this or other Policies:** Any policy of Clear's that does not respect and promote the dignity, independence, integration, and equal opportunity of people with disabilities will be modified or removed.

4) ASSOCIATED DOCUMENTS

- i. Employee Handbook
- ii. AODA Statement of Commitment HS-AD01
- iii. AODA Customer Feedback Form HS-AD04

5) REVISION CONTROL LOG

REV Level	REV Date	Pages Affected	Revised By	Revisions Made
A	29-JUN-2021	All	Director, HR	New layout v. EE Handbook: Ref to new <i>O. Reg.</i> 191/11 vs revoked <i>O. Reg</i> 429/07;
B	14-MAY-2025	All	Director, HR	Reviewed and updated document for compliance.