

AODA Multi-Year Accessibility Plan



REV Date: **16 May 2025**

REV Level: **C**

Doc No.: **HS-AD03**

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PURPOSE:

Outline and identify the policies, processes, and plans Clear Medical Imaging currently has in place, is in the process of developing and/or implementing or intends to develop and/or implement in response to the requirements established by the Integrated Accessibility Standards Regulation (IASR).

SCOPE:

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

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1) DEFINITIONS:

AODA = Accessibility for Ontarians with Disabilities Act, 2005

Clear = 2324317 Ontario Ltd. o/a Clear Medical Imaging

2) POLICY:

Clear is compliant with the Accessibility for Ontarians Disability Act and will ensure continued compliance is met through these important measures:

- i. All AODA documents are reviewed and updated annually if required.
- ii. Additional or more information on this accessibility plan can be obtained by contacting Clear's Human Resources Department by:

1. In person: Clear Medical Imaging corporate office at 1568 Ouellette Avenue, Windsor, Ontario
2. Phone: 519-256-4914
3. Email: info@clearimaging.ca

Standard and accessible formats of this document, and others are free on request from Clear's Human Resources Department.

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2) PROCEDURES:

Clear has processes in place to ensure continued support and sharing of information is available, in a wide range of manners for those with a disability.

a) Customer Service

Accessible Customer Service Policy

Regulation 191/11 of the AODA – Integrated Accessibility Standards

Accessibility Requirement	Clear Medical Imaging Action Plan	Status	Compliance Deadline	Responsibility
Develop and implement an AODA Policy addressing all requirements under the Regulation.	Clear developed and implemented an AODA policy specific to our organization. This policy is maintained by Human Resources.	Complete	01-JAN-2023	Human Resources
Develop and deliver training to all staff, volunteers, and new hires.	Training and annual refresher training courses have been developed and delivered. All new hires complete AODA training during onboarding. Training records are maintained by Admin/HR.			
Develop and make public a process for receiving and responding to feedback from patients with disabilities.	Clear has developed and made public a process for receiving and responding to feedback from patients with disabilities, which includes alternate formats upon request (e.g., in person when safe to do so).			

b) Part 1 – General Requirements

Accessibility Policy

Regulation 191/11 of the AODA – Integrated Accessibility Standards

Accessibility Requirement	Clear Medical Imaging Action Plan	Status	Compliance Deadline	Responsibility
i. Accessibility Policies				
Create and make public a statement of commitment.	Clear has created and made public a statement of commitment. The statement of commitment is located on the company's website.	Complete	29-JUN-2021	Human Resources
Develop and implement company-specific accessibility policies.	Clear policies and procedures have been reviewed to identify current and future barriers to accessibility. The Accommodation Policy is available to all Employees and will be provided to all new hires during Onboarding. Alternative formats are available upon request, including in-person presentations.			
ii. Multi-Year Accessibility Plan				
Create and make public a multi-year accessibility plan. Utilize an AODA committee, comprised of trained management& worker representatives.	The Accessibility Plan has been created to include training, policy and procedure development to ensure the identification and removal of barriers.	Complete	29-JUN-2021	Human Resources
Provide the plan in accessible formats upon request.	Requests for accessible formats of this document will be forwarded to Human Resources, who will work with the individual to determine the most suitable format.	Complete	01-MAR-2021	Human Resources
Review the plan every two (2) years.	This plan will be amended as required and will be reviewed fully by January 1, 2019, and every five (5) years thereafter.	Complete	29-JUN-2021	Human Resources

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c) Part 2 – Information and Communication Standards

Accessibility Policy

Regulation 191/11 of the AODA – Integrated Accessibility Standards

Accessibility Requirement	Clear Medical Imaging Action Plan	Status	Compliance Deadline	Responsibility
i. Accessible Websites and Web Content				
Ensure website and web content published after January 1, 2012, conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.1, Level AA.	Clear's web developer company is fully aware of WCAG 2.1 Level AA. requirements and will ensure all new content and/or any upcoming edits to the website conform to established guidelines.	Complete	30-JUN-2021	Human Resources
ii. Feedback				
Upon request, be able to receive and respond to feedback from guests or individuals inquiring about Clear Medical Imaging.	A process for receiving and responding to accessible feedback requests has been developed and communicated to all relevant Employees. Receiving and responding to feedback will be included in Onboarding all new hires.	Complete	01-MAR-2021	Human Resources
iii. Accessible Formats and Communication Supports				
Upon request, provide accessible formats and communication supports to individuals with disabilities.	Complete an assessment of the ways in which each division provides information to patients, vendors or the public.	Complete	01-MAR-2021	Human Resources
Notify the public of the availability of accessible formats and communication supports.	Train Employees on guidelines/processes and ensure they are aware that requests that cannot be met immediately must be forwarded to Human Resources who will arrange for a suitable alternative. Make public Clear's ability to provide for, or arrange for, the provision of accessible formats and communication supports by posting a statement on the Clear website.	Complete	01-JAN-2022	Human Resources

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d) Part 3 – Employment Standards

Accessibility Policy

Regulation 191/11 of the AODA – Integrated Accessibility Standards

Accessibility Requirement	Clear Medical Imaging Action Plan	Status	Compliance Deadline	Responsibility
i. Workplace Emergency Response Information				
Create and implement individualized plans to assist employees with disabilities during an emergency.	Emergency planning information and directions are also included in relevant Clear policies which will always be provided and communicated to all current Employees and provided to all new hires during Onboarding.	Complete	01-MAR-2021	Human Resources
Obtain consent from Employees with individualized plans to disclose emergency response or evacuations plans to the person(s) responsible for assisting the Employee in situations where the plan requires assistance.	The process for providing emergency information includes alternative formats and will be completed in a timely manner upon receipt of the request or becoming aware of the need for an individualized plan.	Complete	01-MAR-2021	Human Resources
Create and provide emergency information formatted in such a way that the employee with the disability can understand its contents/direction.	The process/policy used by Human Resources to develop an individualized emergency response plan includes the requirement that consent is obtained from the requesting employee to disclose the contents of the plan to the individual required to aid when responding to the emergency or evacuation.	Complete	01-MAR-2021	Human Resources
Review the individualized plan/information: a. When the Employee moves to a different department; b. When the Employee's overall accommodation needs, and plan are reviewed; and c. When the company reviews its general emergency response policies.	Individualized emergency plans include the requirement that the plan be reviewed: a. If Employee moves to another division which would affect that person's ability to respond to an emergency or evacuation; b. On a recurring timeline, to be established during the creation of the individualized emergency response plan. A review of the plan will also be initiated if requested by the Employee; c. When Clear amends its emergency response and/or evacuation procedures.	Complete	01-MAR-2021	Human Resources
ii. Documented Individual Accommodation Plan(s)				
Develop and implement a written process for the development of documented individual accommodation plans for Employees with disabilities.	Clear will develop and implement a written process for the development of documented individual accommodation plans for employees with disabilities. As per IASR requirements, the plan will include the following: a. The manner in which an Employee requesting accommodation can participate in the development of the accommodation plan; b. The means by which the Employee is assessed on an individual basis; c. The manner in which Clear can request the participation of a representative from the company in the development of the accommodation plan. d. The steps that will be taken to protect the privacy of the Employee's personal information; e. The content of the accommodation plan will be restricted to only those required to facilitate the plan or supervise the Employee. f. An outline of how the reasons for a denial of an accommodation will be	Complete	01-MAR-2021	Human Resources

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	<p>communicated to the requesting Employee;</p> <p>g. The means of providing the individual accommodation plan in a format that considers the Employee's accessibility needs due to a disability;</p> <p>h. The accommodation plan template will include a section regarding the provision of accessible formats and communication supports to be completed in the event that such supports are required by the Employee.</p> <p>i. The accommodation plan will also include an emergency response/evacuation plan if required by the employee.</p>			
iii. Recruitment, Assessment and Selection				
Notify employees and the public about the availability of accommodation for applicants with disabilities.	On the Clear website is an accessibility statement about on our job postings notifying applicants that reasonable accommodations will be made upon request. Successful applicants will be informed of the availability of accommodations relating to Athena Automation's selection/assessment processes upon initial contact from the hiring manager or HR department;	Complete	01-MAR-2021	Human Resources
During the recruitment process, notify applicants selected to participate in our selection and assessment processes that accommodations are available upon request.	Any accommodation request pertaining to the company's selection/assessment methods that cannot be met with current alternate formats will be forwarded to Human Resources who will work with the individual to develop an acceptable alternative.	Complete	01-MAR-2021	Human Resources
Should a job applicant request accommodation, consult with the individual and adjust best suit his/her needs without undue hardship to the company.	When scheduling interviews, Clear will include a statement in all email confirmations indicating to the applicant that accommodations are available.	Complete	01-MAR-2021	Human Resources
Notify successful applicants of the company's policies for accommodating employees with disabilities.	Clear's AODA Policy will be provided to all new hires during Onboarding. Alternative formats of the policy will be made available upon request.	Complete	01-MAR-2021	Human Resources
iv. Accessible Formats and Communication Supports for Employees				
Where an Employee with a disability requests it, work with that individual to provide or arrange for the provision of accessible formats and communication supports for: <ul style="list-style-type: none"> a. Information that is needed in order to perform the Employee's job; and b. Information that is generally available to Employees in the workplace. 	<p>The availability of accessible formats and communication supports has been communicated to all Employees through Clear's AODA Policy.</p> <p>All future employees will be made aware of their availability through the same policy which is provided with the new hire induction package.</p>	Complete	01-MAR-2021	Human Resources
Where a request is made, work with the requesting employee to determine the suitability of the proposed accessible format /communication support.	Information that is needed to perform an Employee's job is generally provided via one-on-one or group training sessions whereas information that is generally available in the workplace is typically provided in written policy format or electronically. Prior to providing the information needed to perform one's job or information generally available in the workplace, Employees requiring accessible formats or communication supports will be requested to notify Human Resources so that alternate arrangements may be made.	Complete	01-MAR-2021	Human Resources

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	Upon receiving a request, Human Resources will work with the employee and any individuals responsible for providing the information to deliver a suitable accessible format or communication support.			
v. Information for Employees				
Communicate the company's policy on accommodating employees with disabilities to all staff members.	Clear's AODA Policy has been developed. The policy will be posted on the company's employee bulletin boards. Ensure all employees are informed of changes to the AODA Policy as they occur. Changes will be communicated via email.	Complete	30-JUN-2021	Human Resources
Ensure that all new hires are informed of the company's policy on accommodating employees with disabilities.	Provide all new hires with the AODA Policy in their new hire package. The policy addresses all of the means by which Athena Automation will support employees with disabilities, including emergency planning/responses, accessible formats, communication supports, accessible performance management, career development and job change.	Complete	01-MAR-2021	Human Resources
vi. Processes to Accommodate Employees / Return to Work Processes				
Create a process to develop accommodation plans and return to work plans for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.	Assess IASR requirements and develop a template accommodation form and a return-to-work form that both address all applicable requirements.	Complete	01-MAR-2021	Human Resources
vii. Accessible Performance Management, Career Development & Job Changes				
Ensure the organization's performance management and career development opportunities account for the accessibility needs, plans of employees and that these processes are inclusive and barrier-free.	Evaluate Clear's current performance management and career development processes to identify barriers. Identify/outline accessible performance management and career progression options to ensure consistent and clear communication to all employees.	Complete	01-MAR-2021	Human Resources
viii. Redeployment / Reassignment				
Consider the accessibility needs and accommodation plans of Employees who are reassigned to an alternate division or position within Clear as an alternative to a layoff.	As part of the redeployment process, Clear will incorporate the accessibility needs and accommodation plans of any Employee that is being redeployed to an alternate position and/or division.	Complete	01-MAR-2021	Human Resources

3) ASSOCIATED DOCUMENTS

- i. Employee Handbook
- ii. AODA Statement of Commitment HS-AD01
- iii. AODA Accessibility Policy HS-AD02
- iv. AODA Accessible Feedback Policy & Form HS-AD04

4) REVISION CONTROL LOG

REV Level	REV Date	Pages Affected	Revised By	Revisions Made
A	29-JUN-2021	All	Director, HR	Initial Release
B	12-OCT-2022	All	Director, HR	Updated dates in a) and c).
C	16-May-2025	All	Director, HR	Reviewed for continued compliance.