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).

DOCUMENT CONTENTS:

a. Definitions
b. Policy Statement
c. Procedures
    a. Training
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    c. Communication
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    e. Support Persons
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1) DEFINITIONS:

a. **Clear** = Clear Medical Imaging (2324317 Ontario Ltd)
b. **Accessible format:** A format that considers accessibility needs due to disability, and that the employee can use, such as large print, plain language, audio, Braille, or an electronic text format.
c. **Accommodation.** An adjustment to a job, the work environment, or the way work is done or measured, that removes a barrier and enables an employee with a disability to perform the essential duties of the position.
d. **Approach:** means reaching the staffed side of a service counter closely enough to conduct a transaction in the ordinary way, whether seated or standing.
e. **Communication support:** A support that helps a person understand and be understood, such as sign language interpretation, real-time captioning, or reading services.
f. **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.

g. **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.

h. **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.

i. **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.

j. **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.

k. **Mobility Aid Device:** means any device used by an individual to assist with mobility, including a wheelchair, a motorized wheelchair or scooter, a walker, a cane or white cane, crutches, a brace, a prosthetic device, a service animal, and any other aid or support a person uses to move about, balance or remain stable.

l. **Service Counter:** means any point at which the organization delivers goods or services directly to an individual, whether staffed by employee or volunteers, and whether it is a counter, desk, kiosk, window or mobile point of service.

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.

b. **Assistive Devices:** The organization is committed to serving every individual who uses a mobility aid device in a manner that respects their dignity, independence and integration, and that gives them the same opportunity to obtain goods and services as any other individual.

Where an individual using a mobility aid device is unable to approach a service counter — because the counter is too high, the approach is too narrow or obstructed, there is no clear space for the device to turn or park, the floor surface or threshold impedes the device, or any other condition prevents them from reaching the staffed side — **staff will make every reasonable effort to provide service to the individual.**

Every reasonable effort includes, as appropriate to the individual's needs and the circumstances:

- Going to the individual and serving them where they are able to wait, rather than requiring them to come to the counter.
- Moving the transaction to an accessible location, such as a lowered counter, an unobstructed adjacent area or a nearby table or seating area.
- Bringing the goods, documents, forms, terminal or equipment needed to complete the transaction to the individual.
- Offering to complete the transaction on the individual's behalf, with their consent, where handling an item at the counter is not possible for them.
- Completing paperwork, processing payment, or arranging delivery or later pickup, so the individual does not have to reach the counter to be served.
- Clearing the approach and the surrounding area of boxes, displays, signage, furniture and other barriers, and providing clear space for the device to approach, turn and park.
- Asking the individual how they would prefer to be served and following that preference, rather than assuming what assistance is required.
- Offering an alternate service point, an alternate time, or an appointment where the counter cannot serve the individual at that moment and helping get there.
- Communicating in an accessible way throughout, considering any disability-related need the individual has identified.

Staff will not require an individual to explain their disability, and will not ask for medical documentation, as a condition of receiving service in this manner. Where an individual is accompanied by a support

person or a service animal, the support person or service animal is welcome at the counter and at the alternate point of service.

All future builds will include accessible service counters that meet or exceed the requirements found within the AODA legislation.

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.

Clear Medical Imaging will make available written information and other forms of communication accessible upon request and has a process by way of the Customer Feedback form for receiving and responding to feedback to ensure that all of our processes are accessible to person with disabilities.

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.

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.

Clear Medical Imaging will make available written information and other forms of communication accessible upon request and has a process by way of the below Form for receiving and responding to feedback to ensure that all of our processes are accessible to person with disabilities.

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. **Employment:**
Clear is committed to an accessible workplace. Employees with disabilities will be informed of the policies and supports available to them, will have their accessibility needs considered in the provision of job accommodations, and will not be required to ask for information that the organization is required to give them.

The organization will inform employees of the following supports and of the policies that govern them:

- **Job accommodations:** Adjustments to duties, hours, scheduling, workspace, equipment, supervision or work location that consider the employee's accessibility needs due to disability.
- **Accessible formats and communication supports:** Information that employees need to do their job, and the supports in section 26 of the regulation, provided in a format the employee can use and at no cost to the employee.
- **Individualized workplace emergency response information:** Individualized information for employees with a disability where the disability makes individualized information necessary.
- **Documented individual accommodation plans:** A written plan recording the accommodations the employee will receive.
- **A return-to-work process:** Support for employees who have been absent from work due to a disability and need disability-related accommodation to return.
- **Performance management career development and redeployment:** Consideration of the employee's accessibility needs and accommodation plan in these processes.
- **Assistance with the accommodation request:** Help for any employee who needs support to make a request or to complete the accommodation process.

Methods of Communication:

- **Onboarding package:** This policy and the related documents are provided to every new employee as soon as practicable as part of the organization's onboarding process.
- **Offer of employment:** Successful applicants are notified of the organization's policies for accommodating employees with disabilities when the offer is made.
- **Accessible, always-available location:** A current version of this policy is kept on the organization's internal site or shared drive and accessible in Payworks in company documents section and is available in an accessible format on request.
- **Updates on policy change:** Whenever a policy on the provision of job accommodations changes, the organization informs employees of the change and provides updated information.

An employee may request accommodation, or ask about the supports described in this section, at any time, in the manner that is easiest for them. A request may be made verbally or in writing and does not need to use a particular form or the word "accommodation."

Requests are handled confidentially. Information about an employee's disability is shared only with those who need it to provide the accommodation, and only with the employee's consent, except where the organization is required by law to act on it.

Individualized Workplace Emergency Response Information:

Where an employee has a disability that makes individualized workplace emergency response information necessary, and the organization is aware of the need for accommodation, the organization provides that information to the employee as soon as practicable.

- **Provided to** the employee, in a format that considers the employee's accessibility needs;
- **Also provided to** a person designated by the organization to assist the employee, where the employee requires assistance and consents to the disclosure.

The information is reviewed:

- when the employee moves to a different location in the organization;
- when the employee's overall accommodation needs or plans are reviewed; and
- when the organization reviews its general emergency response policies.

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 *O. Reg. 191/11* vs revoked *O. Reg 429/07*;
B	14-MAY-2025	All	Director, HR	Reviewed and updated document for compliance.
C	24-NOV-2026	All	Director, HR	Updated definitions added communication and feedback information in accessible formats. Added information related to service counters. Added Employment section.