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Intent

Family First Family Health Organization and Family First Family Health Team, collectively referred to as “Family First”, are committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario’s accessibility laws.

This policy is intended to meet the requirements of the Customer Service Standards included in the Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by Family First shall follow the principles of dignity, independence, integration and equal opportunity. Family First will work to break down the barriers that prevent or limit persons with disabilities from employment, receipt of goods and services, the built environment, and information and communication through the implementation of accessibility standards.

Definitions

Assistive Device – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that patients bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing,



remembering and/or reading.

Disability – The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

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

Guide Dog – Is 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 who are blind.

Service Animal – an animal is a service animal for a person with a disability if:

1. 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
2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario;
 - A member of the College of Occupational Therapists of Ontario;
 - A member of the College of Optometrists of Ontario;
 - A member of the College of Physicians and Surgeons of Ontario;
 - A member of the College of Physiotherapists of Ontario;
 - A member of the College of Psychologists of Ontario; or
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

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:

- 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.

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, medical needs or access to goods and services.

Guidelines

In accordance with the Customer Service Standards, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. Training;
- C. The Use of Assistive Devices;
- D. The Use of Guide Dogs, Service Animals and Service Dogs;
- E. The Use of Support Persons;
- F. Notice of Service Disruptions;
- G. Customer Feedback;
- H. Notice of Availability and Format of Required Documents;
- I. Self-service Kiosks;
- J. Employment;
- K. Design of Public Spaces
- L. Compliance Standards and Review of Reports



A. The Provision of Goods and Services to Persons with Disabilities

Family First will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all patients receive the same value and quality;
- Allowing patients with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that Patients with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the patient's disability.

B. Training

Training will be provided to:

- Every person who is an employee of, or a volunteer with, Family First.
- Every person who participates in developing Family First's policies.
- Every other person who provides goods, services or facilities on behalf of Family First.

Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the Customer Service Standards.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Family First's policies, procedures and practices pertaining to providing accessible customer service to Patients with disabilities.

Training Schedule

Family First will provide training as soon as practicable to new employees. Training will be provided to new employees, volunteers, agents and/or contractors during their orientation. Revised training will be provided in the event of changes to legislation, procedures, policies, and/or practices

Training Courses

At Family First, we use HRdownloads to provide training to our employees. When new employees are hired, they are given a HRdownloads account and are assigned training bundles



that include mandatory courses, such as the AODA Customer Service Standards Training and Understanding Human Right Training (AODA Edition) which are required for all workers. Family First leaders also receive additional training on AODA legislation, including requirements for accessibility standards, and ways to improve accessibility in our workplace. These courses include:

IASR: Design of Public Spaces Training

IASR: Information and Communications Standards and Employment Standards Training

Improving Workplace Accessibility Training for Leaders

These courses are designed to help our workers provide excellent customer service to individuals with disabilities. The courses cover different types of disabilities, ways to assist and provide aid to those with certain types of disabilities, and explores ways to improve customer service principles and skills by examining ways to lessen barriers for those with disabilities. Our leaders also receive training on AODA legislation, including requirements for accessibility standards, and ways to improve accessibility in our workplace.

By providing this training to our employees, we are committed to promoting a culture of accessibility and inclusion, and ensuring that all individuals receive the highest level of customer service possible, regardless of their abilities.

C. The Use of Assistive Devices

Patient's Own Assistive Device(s)

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Family First.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a patient with an oxygen tank may involve ensuring the patient is in a location that would be considered safe for both the patient and clinic.

D. Guide Dogs, Service Animals and Service Dogs

A patient with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas

A patient with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) Family First will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).



Applicable Laws

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow 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, Ontario: 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 (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the patient for reasons relating to his or her disability, Family First may request verification from the patient.

Care and Control of the Animal:

The patient 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, including the disposal of waste, which should be disposed outside of Family First premises.

Allergies

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

E. The Use of Support Persons

If a patient with a disability is accompanied by a support person, Family First will ensure that both persons are allowed to enter the premises together and that the Patient is not prevented from having access to the support person.

There may be times where seating and availability prevent the patient and support person from sitting beside each other. In these situations Family First will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the patient, prior to any conversation where confidential information might be discussed.



Admission Fees

Where Family First requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, Family First will not charge the support persons any fees.

F. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Family First. In the event of any temporary disruptions to facilities or services that patients with disabilities rely on to access or use Family First's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur, Family First will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Family First website;
- contacting Patients with appointments;
- verbally notifying Patients when they are making an appointment; or
- by any other method that may be reasonable under the circumstances.

G. Customer Feedback

Family First shall provide patients with the opportunity to provide feedback on the service provided to patients with disabilities. Information about the feedback process will be readily available to all patients and notice of the process will be made available on the Family First's website.

Feedback may be provided verbally (in person with a pre-arranged appointment) or written (hand written, delivered, through our Feedback form) or electronically through email at feedback@ffhc.ca.

Submitting Feedback

Patients can submit feedback to:

K. Rizk, General Manager
c/o Family First Health Centre
PO Box 91569 RPO MER BLEU,
Orleans, ON K1W 0A6
feedback@ffhc.ca

OR

K. Stanton, Executive Director
c/o Family First Family Health Team
PO Box 91569 RPO MER BLEU,
Orleans, ON K1W 0A6
feedback@ffhc.ca



Patients who wish to provide feedback can do so by completing an onsite patient feedback form or verbally with any Family First team member. This information will then be shared with the General Manager, Executive Director or designate.

Patients who provide formal feedback will receive acknowledgement of their feedback within 10 days of receipt, along with any resulting actions based on concerns or complaints that were submitted.

H. Notice of Availability of Documents

Family First will notify the public that documents related to accessible customer service, are available upon request by posting a notice on our website and by any other method that may be reasonable under the circumstances.

Family First will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

I. Self-service Kiosks

Family First will consider accessibility for people with disabilities when procuring self-service kiosks.

J. Employment

Family First will make every effort to identify, remove, and prevent barriers by developing inclusive employment procedures that support persons with disabilities with accommodations during the recruitment and selection stages, and throughout the employment life cycle.

Family First notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. When selected to participate in an assessment or selection process, applicants are notified individually to advise that accommodations are available upon request. Family First works with the applicant to provide or arrange suitable accommodation.

Family First will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- 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.

Where needed, Family First will provide customized information to help an employee with a disability during an emergency. With the employee's consent, Family First will provide workplace emergency information to a designated person who is providing assistance to that employee as soon as practicable after Management and/or Occupational Health and Safety committee member becomes aware of the need to accommodate. The emergency response plan will consider 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.

Family First has a process to develop individual accommodation plans for employees included disability-related accommodations in order to return to work. This process includes working directly with the employee to identify suitable accommodations.

K. Design of Public Spaces



Family First will advise leaseholder and building owner of accessibility laws should they make major changes to public spaces in Family First. Family First will work to ensure that the built environment, including building interior and exterior, are designed to facilitate barrier-free access to goods or services for patients and employees. If areas of the built environment are not accessible for certain individuals with disabilities, the company will work with the individual to provide an alternate means of access.

L. Compliance with Standards and Review of Reports

Section 14 of the Accessibility for Ontarians with Disabilities Act (AODA) outlines the requirement for organizations to file an Accessibility Compliance Report with the director annually, or at other times as the director may specify. Family First will comply and file an accessibility compliance report every 3 years.

Specifically, subsection (1) of section 14 states that any person or organization to whom an accessibility standard applies must file an accessibility report with the director. This report outlines the measures that the organization has taken during the applicable accessibility reporting period to identify, remove and prevent barriers, and to meet their obligations under the AODA and its accessibility standards. The accessibility reporting period and other details of the report are set out in the regulations under the AODA.

Subsection (2) of section 14 states that any person or organization that files an Accessibility Compliance Report under subsection (1) must make the report available to the public. This means that if an organization is required to file an Accessibility Compliance Report under the AODA, they must make the report available to the public upon request. Family First will make this report available upon request. Family First wants to promote transparency and accountability with respect to accessibility compliance.

Administration

If you have any questions or concerns about this policy or its related procedures please contact:

K. Rizk, General Manager
c/o Family First Health Centre
PO Box 91569 RPO MER BLEU,
Orleans, ON K1W 0A6
feedback@ffhc.ca

OR

K. Stanton, Executive Director
c/o Family First Family Health Team
PO Box 91569 RPO MER BLEU,
Orleans, ON K1W 0A6
feedback@ffhc.ca

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.