

Accessibility

This document includes:

Policy Procedure Standard Operating Procedure

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1 PURPOSE

The purpose of this policy is to:

1. Articulate Group Health Centre's (GHC) commitment to accessibility.
2. Provide guiding principles, rules, and approaches to ensure compliance with the implementation of the *Integrated Accessibility Standards Regulation (IASR)* under the *Accessibility for Ontarians with Disabilities Act (AODA)*.
3. Describe the shared responsibility of GHC's physicians, medical learners, employees, volunteers, and community to ensure an accessible and barrier-free organization.
4. Facilitate the identification, removal, and prevention of barriers to persons with disabilities when accessing GHC's information and communication, goods, services, facilities, and premises.

2 SCOPE

This policy applies to all employees, physicians, medical learners, volunteers, students, and contractors.

3 STATEMENT OF COMMITMENT

GHC is 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 meeting the needs of people in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the AODA and Ontario's accessibility laws.

GHC is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code and understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

GHC is committed to excellence in serving and providing goods, services or facilities to all persons, including people with disabilities.

4 DEFINITIONS

Term	Definition
Assistive Device	A technical aid, communication device or other instrument used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that people 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	As defined by the <i>Accessibility of Ontarians with Disabilities Act, 2005</i> , and the <i>Ontario Human Rights Code</i> , refers to: <ul style="list-style-type: none"> • 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 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	A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the <i>Blind Persons’ Rights Act</i> , to provide mobility, safety and increased independence for people who are blind.

<p>Service Animal</p>	<p>As reflected in <i>Ontario Regulation 429/07</i>, an animal is a service animal for a person with a disability if:</p> <ul style="list-style-type: none"> • it is readily apparent that the person uses the animal for reasons relating to his or her disability; or • if the person provides documentation from a regulated health professional confirming that the person requires the service animal for reasons relating to their disability.
<p>Service Dog</p>	<p>As reflected in the <i>Health Protection and Promotion Act, Ontario Regulation 562</i> a dog other than a guide dog for the blind is a service dog if:</p> <ul style="list-style-type: none"> • 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 documentation from a regulated health professional confirming that the person requires a service dog.
<p>Support Person</p>	<p>As reflected in <i>Ontario Regulation 429/07</i>, a support person means, in relation to a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care, medical needs or access to goods and services.</p>

5 POLICY DETAILS

In June 2005, the Ontario government passed the AODA. The purpose of this enhanced Act is to develop, implement and enforce standards of accessibility for all Ontarians. GHC's Accessibility Policy is consistent with the AODA, the Accessibility Standards for Customer Service, Ontario Regulation (O. Reg. 429/07) that was passed on January 1, 2008, and the Integrated Accessibility Standards (O. Reg. 191/11) passed on July 1, 2011. These regulations set accessibility standards related to customer service, information and communication, employment, transportation and the design of public spaces. All public sector organizations, including GHC, are required to comply with the requirements as applicable. All people, regardless of disability, have equal right of access to all goods, services and facilities provided by GHC.

5.1 GENERAL PROVISIONS

5.1.1 Accessibility Policy

Through the Accessibility Policy, GHC reaffirms our commitment to promptly meeting the needs of people with disabilities. The policy will be posted on the GHC website and provided in an accessible format upon request.

5.1.2 Accessibility Plan

GHC will maintain a multi-year accessibility plan. This plan will be reviewed and updated at least once every five years.

Each year, GHC will publish an annual status report outlining the actions taken to implement the strategies specified in the multi-year plan.

The multi-year accessibility plan and the annual status reports will be publicly available on the GHC website and provided in an accessible format upon request.

5.1.3 Accessibility Committee

GHC's Accessibility Committee is designed to promote and ensure equitable access to all programs, services, facilities, and digital environments within GHC. The committee serves as a guiding body to identify barriers, recommend solutions, and foster a culture of inclusion for individuals of all abilities.

5.1.4 Procurement

GHC will consider accessibility when making decisions about the procurement or acquisition of goods, services, and facilities. When it is not feasible to integrate accessibility into the procurement or acquisition process, an explanation will be provided upon request.

5.1.5 Self-Service Kiosks

GHC will include accessibility features when designing, procuring, or acquiring self-service kiosks, except where it is not practicable.

5.1.6 Training

GHC will ensure all physicians, medical learners, employees, volunteers, students, contractors and anyone providing goods, services, or facilities on behalf of GHC, receive training on:

- the requirements of AODA, IASR, and the Ontario Human Rights Code regarding individuals with disabilities;
- the provision of goods, services, and facilities to people with disabilities, including an AODA customer service segment;
- accessibility as it relates to their specific roles; and
- any changes to the legislation, policies, and procedures.

Training will be delivered via e-learning and available in accessible formats upon request. Training may also be delivered by the appropriate educational institution for medical learners and students.

Human Resources will maintain the necessary records to monitor compliance.

5.1.7 Service Animals

GHC will ensure that a person with a disability who is accompanied by a guide dog or other service animal is permitted to enter GHC premises that are open to the public and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises.

If a service animal is excluded by law from the premises, other measures to enable the person with a disability to obtain, use or benefit from GHC's goods or services may be used.

People with disabilities accompanied by a guide dog or service animal may access all areas where they would generally be allowed and will not be segregated from others.

Service animals need to be in a harness or identified by medical certification as noted in the Definitions section of this policy.

Pets are not allowed on GHC premises.

The owner must always be in control of the service animal. Owners are responsible for their animals and for any damages caused by the animals. Any guide dog or service animal behaviour that poses a direct threat to the health and safety of other people may be excluded from GHC premises. However, the person with a disability will have the option of continuing to use GHC services and facilities without having their guide dog or service animal on the premises.

There are specific questions that may be asked of a person being accompanied by a service animal. If it is not readily apparent, GHC physicians, medical learners, employees, volunteers, students, and contractors may ask:

- If the service animal is required because of a disability
- If an animal is a service animal and what services it provides
- If the person has documentation from a health professional confirming they require the animal for reasons relating to their disability

Employees may NOT ask questions about a person's disability.

If further assistance is required, employees should contact GHC Communication, Planning and Risk department.

5.2 CUSTOMER SERVICE

5.2.1 Communication

GHC physicians, medical learners, employees, volunteers, students and contractors will respectfully consider a person's disability when interacting or communicating with them.

The following principles guide interaction and communication with persons with disabilities:

- **Dignity:** Providing services in a way that allows people with disabilities to maintain self-respect and the respect of others.
- **Equal Opportunity:** Offering people with disabilities an equal opportunity to benefit from GHC services.
- **Independence:** Allowing people with disabilities to do things independently without unnecessary help or interference from others.
- **Integration:** Allowing people with disabilities to benefit from the same service, in the same place, and in the same or similar ways to others.

5.2.2 Format of Documents

Upon request, documents will be provided in alternative formats that will take into account the person's disability.

5.2.3 Assistive Devices

GHC acknowledges that some individuals with disabilities use their own personal assistive devices to access goods, services, and facilities. GHC will allow these devices unless they pose a risk to the health and safety of the person with a disability or others.

If a person with a disability cannot use his or her own assistive device because of health and safety risks, GHC will take reasonable measures to assist this person in accessing services.

GHC will ensure that the patient's personal health information is protected through procedures related to the use of assistive devices, where applicable.

5.2.4 Support Persons

If an individual with a disability is accompanied by a support person, GHC will ensure that both individuals are allowed to enter the premises together. At no time will a person with a disability who is accompanied by a support person be denied access to their support person while on GHC premises.

If a support person is required for the health and safety of a person with a disability, that support person must stay with the individual at all times.

GHC, in consultation with the person with a disability and considering the available evidence, may decide that a support person is necessary to ensure the health and safety of the person with a disability or others on the premises. If a support person is deemed necessary, a parking token will be provided if an additional cost is incurred, and any applicable fee or fare for the support person will be waived.

In situations where confidential information might be discussed in the presence of a support person at GHC, consent will be obtained from the individual before any conversation.

5.2.5 Notice of Service Disruptions

When possible, GHC will notify the public if there is a temporary or planned disruption affecting facilities or services that people with disabilities usually use in accessing GHC's goods, services, or facilities.

The notice will be clearly posted and include details such as the reason, anticipated duration, and alternative services available.

The type of notice will depend on the circumstances. The notification may be given by posting a written notice in common areas or a communication on GHC's website or social media channels.

When a disruption occurs unexpectedly, notice will be posted as soon as possible, at a conspicuous place on GHC premises or provided by such other method reasonable in the circumstances.

5.2.6 Feedback

GHC welcomes and appreciates feedback regarding how goods, services, and facilities are provided to persons with disabilities.

Feedback may be provided in any of the following ways:

- In person at GHC's premises;
- By telephone;
- In writing;
- Or electronically via our website.

GHC will make reasonable efforts to resolve complaints within five (5) business days of receipt. Persons who wish to be contacted about their complaint will be contacted by a manager or designate. Feedback will be used to improve the way GHC provides services to people with disabilities.

GHC will ensure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Feedback received will be documented in GHC's patient relations management procedures.

5.3 INFORMATION AND COMMUNICATION

5.3.1 Feedback

GHC will ensure that its processes for receiving and responding to feedback are accessible to people with disabilities and will notify the public about the availability of accessible formats and communication supports.

5.3.2 Accessible Formats and Communication Supports

GHC shall provide or arrange for accessible formats and communication supports for people with disabilities in a timely manner that considers each person's accessibility needs.

GHC will consult with the person making the request to determine the suitability of an accessible format or communication support.

Communications support will be provided at a cost that is no more than the regular cost charged to others.

5.3.3 Accessible Websites and Web Content

GHC will make its internet websites and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, and will take all reasonable steps to

ensure full conformance with WCAG 2.1 Level AA unless such conformance is demonstrably impracticable due to technological limitations.

5.4 EMPLOYMENT

GHC's policies and procedures are intended to build an inclusive and accessible work environment free from discrimination and harassment.

5.5 DESIGN OF PUBLIC SPACES

GHC will ensure that redeveloped or newly constructed facilities incorporate accessibility requirements into the planning, design and construction phases.

6 PROCEDURE

Not applicable

7 RELATED DOCUMENTS

Ontario Human Rights Code

Accessibility for Ontarians with Disabilities Act

Integrated Accessibility Standards Regulation

Occupational Health and Safety Act

GHC Multi-Year AODA Plan

HR_Regular Attendance, Accommodations and Return to Work Policy

HR_Sick Leave Adjudication and Short-Term Disability Benefits Policy

PRC_Patient and Visitor Compliment and Concern Policy

8 REVISION HISTORY

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