

POLICY: AODA and INTEGRATED ACCESSIBILITY STANDARDS	POLICY #: 4.1
SECTION: AODA	Effective Date: August 2011
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## PURPOSE

The purpose of the policy is to provide support and direction to Carefirst Seniors and Community Services Association and Carefirst Family Health Team ("Carefirst") to ensure compliance with the Integrated Accessibility Standards (IAS), Ontario Regulation 191/11 under the Accessibility for *Ontarians with Disabilities Act, 2005* (AODA).

Effective July 1, 2016, the *Integrated Accessibility Standards* consolidated the *Accessibility Standards for Customer Service* ("Customer Service Standard") into a single Accessibility Standard.

This policy is intended to meet the requirements of the IAS for the Information and Communications Standards, Employment Standards, Transportation Standards, Built Environment, and the Customer Service Standards, as applicable.

#### SCOPE AND APPLICATION

This policy applies to all Carefirst patients, clients, employees, students, contractors, agents, volunteers, vendors and any third-party relationships that are in contact with Carefirst patients, clients and/or employees. It also applies to all Carefirst locations.

Exceptions in Scope and Application are as follows: Certain procedures regarding Return to Work and Employment apply only to employees of Carefirst.

This policy is available in an alternative format upon request.

#### **KEY DEFINITIONS**

Accessible Formats include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

**Accommodation** means meeting the needs of a person with a disability, e.g. the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation varies depending on the person's unique needs.

Assistive Devices means technical aids, communication devices, instruments or other medical aids modified or customized that are used to increase, maintain or improve how a person with a disability can function. Personal assistive devices are typically devices that people bring with them that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading. An assistive device may be as simple as a pen and paper used to assist a person to communicate. Other examples may include, but are not limited to, wheelchairs, walkers, white canes used by people who are blind or have low vision, note-taking devices, portable magnifiers, recording machines, assistive listening devices, personal oxygen tanks and devices for grasping. Assistive devices may accompany the client or already be on the premises, and are used to assist persons with disabilities in carrying out activities or in accessing Carefirst services.

# POLICY: AODA INTEGRATED ACCESSIBILITY STANDARDS

**Barrier** means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice; ("obstacle")

**Disability -** As defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, a "disability" is:

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

**Mobility Aid** refers to devices used to facilitate the transport, in a seated posture, of people with disabilities.

Mobility Assistive Device refers to a cane, walker or similar aid.

**Non-work related injuries or illnesses** means injuries or illnesses that are not caused by the employee's work or the workplace environment.

**Persons with disabilities** are individuals who have a disability as defined under the Ontario *Human Rights Code*.

**Service Animal** is a "service animal" for a person with a disability if it is obvious that the animal is used by the person for reasons relating to their disability; or if the person provides a letter from a doctor, audiologist speech-language pathologist, chiropractor occupational therapist, optometrist, physiotherapist psychologist, psychotherapist, and mental health therapist confirming that the person requires the animal for reasons relating to the disability.

**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 or medical needs or with access to goods, services or facilities. (*Accessibility for Ontarians with Disabilities Act*, 2005, Ontario Regulation 429/07, *Accessibility Standards for Customer Service*).

"Workplace" includes, but is not limited to, the physical work site, restrooms, cafeterias, training sessions, business travel, conferences, and work-related social gatherings.

"Work-related injuries or illnesses" mean injuries or illnesses sustained in the course of employment and directly related to the employee's occupation at work or the workplace.

## POLICY

The purpose of the AODA is to benefit all Ontarians through the development and enforcement of standards designed to achieve "accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025."

The government of Ontario passed the Act in 2005 to remove barriers and make Ontario a welcoming and accessible place for persons with disabilities.

The Act sets out five accessibility standards in five key areas of daily living:

- 1. Customer service
- 2. Information and communications
- 3. Employment
- 4. Transportation
- 5. Built environment

The Customer Service Standard (Ontario Regulation 429/07) was the first standard that came into force. All private and non-profit organizations had to comply with the law by January 1, 2012.

The standards for Employment, Information and Communications, and Transportation are in the Integrated Accessibility Standards (Ontario Regulation 191/11) which came into force on July 1, 2011; Carefirst is included in the regulation's definition of an "obligated organization", and must comply with the phased-in requirements beginning January 1, 2016.

Requirements for this Standard are being phased in. They address how Carefirst communicates with employees, students and volunteers, patients, clients, and the public. This includes Carefirst's website, training and development, and internal and external workplace communications.

This policy will be reviewed every 2 years and as required to reflect changes in legislation/regulation, and other relevant changes as they arise.

## 1. GENERAL REQUIREMENTS

#### **Accessibility Plan**

Carefirst is committed to

- Ensuring equal access and participation for people with disabilities in a way that allows them to maintain their dignity and independence.
- Fostering a community of integration to meet the needs of people by preventing and removing barriers to accessibility, educating employees, and meeting the accessibility requirements under the Accessibility for Ontarians with Disabilities Act and the related Integrated Accessibility Standards.
- Understanding and upholding current and ongoing obligations under the AODA and its accessibility standards, and Human Rights Code respecting non-discrimination.
- Ensuring all services and employment practices provided by Carefirst will observe the principles of dignity, independence, integration and equal opportunity for persons with disabilities.
- Ensuring patients/clients with disabilities continue to have the assistance of a support person, service animal, or personal assistive device as required during their service.
- Maintaining a multi-year accessibility plan to address, prevent and remove barriers to accessibility

## Training

Carefirst is committed to providing training for its employees, students, volunteers, contractor, vendor, policy developer and all other persons who provide goods, services or facilities on behalf of Carefirst within 3 months when they commence to assume the roles.

Training must include

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the requirements of the Customer Service Standards
- How to interact and communicate with persons with various types of disability
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or the assistance of a support person
- How to use equipment or devices available on Carefirst premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability e.g. wheelchairs, walkers, canes
- What to do if a person with a particular type of disability is having difficulty accessing Carefirst's goods, services or facilities.

Training on the consolidated standards, new requirements, and policy changes must take place for all persons as soon as is practicable. Employees and volunteers who previously received training on customer service standards and the IAS will receive updates on changes to the customer service standards.

## Training Records

Carefirst will maintain records on the training provided including the dates on which the training is provided and the number of individuals to whom it was provided.

## 2. CUSTOMER SERVICE STANDARDS

#### **Communication, Accessible Formats and Communication Supports**

Carefirst will make every reasonable effort to:

- communicate with patients/clients with disabilities in ways that take into account their disabilities
- provide a suitable method of communication that is agreed upon with the patient/client.

Communication methods may include the use of email or relay services if telephone communication is not suitable to the client's needs, or is not available.

Upon request, documents/invoices will be provided in hard copy, large print, or email, and staff will respond to patient/client questions regarding the content of their documents/invoices in person, by telephone, or by email.

Carefirst will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request, *unless the information is deemed unconvertible*. Accessible formats and communication supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.

Carefirst will:

- take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.
- make the availability of accessible formats and communication supports publicly known.

## **Assistive Devices**

Carefirst will make every effort to accommodate any patients/clients who use an assistive device to access our services or facilities on Carefirst's premises or at Carefirst programs.

Clients with disabilities may use their own assistive devices as required. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other

reasons, other measures will be used to ensure the individual with a disability can access our goods, services or facilities.

Each Carefirst program will maintain a list of:

- assistive devices available at their location
- job positions that may require knowledge regarding how to use the devices to help patients/clients acquire services
- staff who have been trained on the use of devices for their particular work (including the date of training and the particular device.

#### **Service Animals**

Carefirst will welcome patients/clients with disabilities who are accompanied into the building by a guide dog or service animal.

The IASR states that a "guide dog" means a guide dog as defined in section 1 of the *Blind Persons' Rights Act.* The IASR also states in Section 80.45 (4) that an animal is a service animal for a person with a disability if,

- (a) 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
- (b) the person provides documentation from a list of regulated health professionals confirming that the person requires the animal for reasons relating to the disability.

If it is not obvious that the animal is a service animal, Carefirst may request that the person with a disability provide documentation from a member of one of the following list of regulated health professionals in Ontario, confirming that the person needs the service animal for reasons relating to their disability:

- Audiologist
- Speech-Language Pathologist
- Chiropractor
- Nurse/Nurse Practitioner
- Occupational Therapist
- Optometrist
- Physicians
- Physiotherapist
- Psychologist
- Psychotherapist, and
- Mental Health Therapist

Service animals are allowed on the parts of Carefirst premises which are open to the public. A person with a disability will be allowed to keep a service animal with him/her unless the animal is not allowed by law, e.g. in a restaurant kitchen. If the service animal is not allowed by law, or if the animal might affect the health and safety of another patient/client, Carefirst will provide an explanation to the patient/client and seek other ways to provide services, e.g. offer staff guidance and offer to secure animals in a safe location.

An individual that 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.

If a health and safety concern presents itself in the form of a severe allergy to the animal, Carefirst will

make all reasonable efforts to meet the needs of all individuals.

## **Support Persons**

Carefirst will welcome patients/clients with disabilities who are accompanied into the building by a support person. There may be situations where Carefirst feels that a support person is needed to protect the health or safety of the person with a disability or the health or safety of others on the premises. Prior to requiring the presence of such a support person, Carefirst would first consult with the person with a disability, as well as the caregiver and/or family, and consider the health and safety implications based on available evidence. The presence of a support person may then only be required if there is no other reasonable way to protect the health and safety of the person or of others on the premises.

#### **Feedback Process**

Carefirst welcomes feedback on how we provide accessible customer service. Customer feedback will help us to identify barriers and respond to concerns. Carefirst ensures its feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, upon request.

Clients who wish to provide feedback are encouraged to speak directly with our staff, students, or volunteers. All feedback will be directed to the respective department, Program Director, and/or COO. Complaints will be addressed according to Carefirst's Complaint Policy.

A Customer Service Feedback form is obtainable on Carefirst's website and all Carefirst locations for patients/clients to provide feedback on their service experience. Patients/clients may also choose the following ways to provide feedback:

	Carefirst Seniors & Community Services Association	Carefirst Family Health Team
By email:	info@carefirstontario.ca	Info.fht@carefirstontario.ca
By fax:	416-502-2382	416-502-8710
By phone:	416-502-2323	416-502.2029
By mail:	300 Silver Star Blvd, Scarborough, ON M1V 0G2	

## **Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to services or facilities at Carefirst locations, Carefirst will post a written notice as soon as possible on its website and in a conspicuous location at individual sites. The notice will include details regarding the reason for the disruption and the duration (if known) as well as any alternatives available to continue with service.

## 3. INFORMATION AND COMMUNICATIONS STANDARDS

## Accessible formats and Communication Supports

Carefirst strives to provide information and communications in ways that are accessible to persons with disabilities to meets their needs. Upon request, Carefirst will provide information about the organization and its services, in accessible formats or with communication supports in a timely manner that takes into account the person's accessibility needs due to disability; and at a cost that is no more than the regular cost charged to other persons.

Carefirst will consult with the person making the request in determining the suitability of an accessible format or communication support.

## **Emergency Procedures, Plans or Public Safety Information**

Although Carefirst does not prepare (and make available) public emergency procedures, plans or public

safety information, it will ensure that all publicly available safety and emergency information (e.g. evacuation procedures, floor plans etc.) are provided in an accessible format or with appropriate communication supports, upon request.

#### Accessible Websites and Web Content

Carefirst will ensure that its website and all web content published after January 1, 2012, conforms to the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, in accordance with the schedule set out in the IASR.

WCAG 2.0 is an industry standard which covers a wide range of recommendations for making website content more accessible. (These guidelines help to make the website accessible to a wider range of people with disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these). The guidelines provide tests to ensure that web content is "perceivable, operable, understandable and robust".

## Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels
- Unconvertible information or communications, or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

#### Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Carefirst will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Carefirst will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

## 4. EMPLOYMENT STANDARDS

Carefirst will ensure consistent and equitable standards for the recruitment, assessment and selection of prospective employees, including persons with disabilities, to create a diverse and qualified talent pool to support current and future business needs.

Carefirst is committed to transparent and merit-based selection in its recruitment process, in compliance with the provisions of the *Ontario Human Rights Code*, the *Accessibility for Ontarians with Disabilities Act*, and any other applicable legislations and/or regulations.

Carefirst will notify employees, students, volunteers, and the public about the availability of accommodation for job applicants who have disabilities. This information will be included on individual job postings/advertisements.

Applicants selected for an interview will be informed that accommodations are available, upon request, for the interview in relation to the materials and candidate selection processes.

Where an accommodation is requested during the selection process, Carefirst will consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes

into account the applicant's accessibility needs due to a disability.

When making an offer of employment, the successful applicant will be notified regarding Carefirst's policies and supports for accommodating people with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

Carefirst will ensure that new employees, students and volunteers are aware of its policies to support employees with disabilities as soon as practicable after they begin their employment (including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.) Carefirst will ensure that everyone is kept informed of any changes to these policies as they occur.

If an employee with a disability requests it, Carefirst will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

Carefirst will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

## **Educational and Training Resources**

Carefirst will provide education, training resources or materials in an accessible format upon request and will do so in a way that considers the individual needs of the personnel. Carefirst will adhere to accessibility standards and principles when designing, adopting, and procuring educational materials and resources. In the case that materials cannot be procured, obtained, or converted into an accessible format, Carefirst will ensure to make the necessary arrangements for the provision of a comparable resource.

## Workplace Emergency Response Information

In any emergency or business interruption, Carefirst has a responsibility to ensure the safety of its employees and to manage emergencies and business interruptions to minimize loss and inconvenience to all concerned.

Where required, Carefirst will create individual workplace emergency response information for employees with disabilities if the disability is such that the individualized information is necessary and Carefirst is aware of the need for accommodation. This information will take into account 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.

If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, Carefirst shall provide the workplace emergency response information to a person designated by Carefirst to provide assistance to the employee.

This information will be reviewed when:

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

## Individual Accommodation Plan (IAP)

Carefirst will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans

shall include specific elements, including:

- The ways in which the employee requesting accommodation can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- Individual accommodation plans shall:
  - ✓ if requested, include any information regarding accessible formats and communications supports provided, e.g., information needed to perform the employee's job, and that is generally available to employees in the workplace
  - ✓ if required, include individualized workplace emergency response information, and
  - ✓ identify any other accommodation that is to be provided.

The accommodation process is a collaborative one and the employer and employee all have a role to play in the process.

Carefirst employees seeking accommodation are required to:

- participate in the development of the plan, and expected to provide their fullest cooperation in providing any necessary, sufficiently detailed information and medical assessments describing the employee's needs which are relevant to determination of the accommodation request
- provide the necessary information within the specified time following the employer's request unless a legitimate justification for extending the timeline exists
- make best efforts to perform work assigned by the employer
- promptly notify the employer and provide updated medical or other information if there is a change to the employee's medical needs or prognosis.

Failure to meet the above mandatory obligations i.e. failure to cooperate and/or participate in the development or performance of the IAP is considered a breach of the policy and could result in employment consequences.

Note: An employee is not entitled to their *preferred* method of accommodation. The duty to accommodate simply requires the employer to provide an employee with *reasonable* accommodation, up to the point of undue hardship.

#### Performance Management and Career Development and Advancement

Carefirst will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required.

#### **Return to Work Process**

Carefirst will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) as set out in the Ontario Human Rights Code, Workplace Safety & Insurance Act, and the AODA, in order to return to work.

Carefirst's goal is to rehabilitate employees absent due to a disability, and ensure an early and safe return to work following any work and non-work related injury or illness.

This policy does not replace or override procedures that are applicable under the *Workplace Safety and Insurance Act* (WSIA).

The return to work process will outline the steps Carefirst will take to facilitate the employee's return to work and shall be documented individual accommodation plans.

Employees who require an accommodation in order to return to work shall submit a request for accommodation following the same process set out in this section of the policy for the development of an individual accommodation plan.

Accessibility needs of employees and individual accommodation plans will be taken into account when managing an employee's performance, career advancement or opportunities for redeployment.

Carefirst's review of individual accommodation plans will be consistent with the procedure/approach for developing an IAP. There will be an initial review period for each employee at the time the IAP is created that is based on medical information provided regarding the employee's prognosis.

After the initial review, review periods will be established based on the individual employee's prognosis, and/or when the need arises. Carefirst recognizes that some employees will have disabilities that remain relatively stable for long periods of time while others will have disabilities that are expected to improve or become more severe within shorter periods of time.

The employee is obligated to notify Carefirst and provide updated medical information if the employee experiences a change in their disability that necessitates a review of the IAP.

Reviews may also be triggered when the employee changes to a new role or position, when the employee is having performance issues, when the employee requests further accommodation, and when Carefirst reviews this policy and related accessibility policies.

Carefirst and its management/supervisory team will:

- Make every effort to ensure that the rehabilitation/return-to-work process begins as soon as practicable so that the employee's maximum physical, psychological and social potential can be restored
- Educate all employees about this policy and procedures and the disability management program, and what to expect when an injury/illness occurs
- Ensure that all employees are aware that, in the event of injury or illness, they will be consulted to develop their rehabilitation and return-to-work plan, and that they will be participating in workplace rehabilitation programs
- Protect employee privacy
- Inform employees that Carefirst will respect the confidential nature of medical information, both verbal and written, and that Carefirst will maintain confidentiality of information received including appropriate storage and handling
- Develop a rehabilitation/return-to-work plan in consultation with the employee, manager, medical practitioner, rehabilitation service, and other professionals as appropriate
- The plan will include:
  - o agreed time frames
  - $\circ$  goals
  - o a list of duties and restrictions
  - $\circ\;$  individual accommodation required (e.g., adjustments to duties, work stations, work hours)
  - o communication support and assistive technologies required

- o hours to be worked
- $\circ$  details of training required
- o anticipated time frame of plan
- o details of pay during the period
- o formal review every month (or sooner if required)
- Provide the plan in accessible format
- Ensure to the extent possible that duties assigned to an employee for a suitable duties program are meaningful and have regard to the objective of the employee's rehabilitation and return-to-work and individual accommodation plans
- Implement a rehabilitation and return-to-work plan, providing suitable duties where practicable, with the aim of returning the employee to normal duties
- Consult with employees and, where appropriate, treating medical practitioners to ensure that rehabilitation/return-to-work procedures operate effectively and safely
- Consult and advise on the injured or ill employee's capabilities, and negotiate workplace adjustments, support and individual accommodation (e.g., communication, assistive technology, flexible work schedule) in advance of their return to work where appropriate and with the necessary consent of the returning employee
- Monitor the employee's progress in relation to suitable duties
- If an employee is not progressing and achieving goals as agreed in the rehabilitation and return-to-work plan, the manager (and medical practitioner) will identify areas of concern, seek appropriate additional advice as indicated and amend the plan
- Conduct a return-to-work meeting in accordance with the disability management process, policies and procedures
- Review employees who return to work with accommodation/restrictions to assess progress and fitness to return to normal duties. Review ongoing restrictions/absences on a monthly basis or at other intervals as required by the employee's individual circumstances
- Maintain accurate records of the employee's hours worked and performance reviews
- Conclude workplace rehabilitation and the return-to-work plan when the employee resumes all the prescribed duties for the role to which they were appointed.
- Where there is a disagreement over the proposed plan offered, discussions will take place with the employee, manager, and medical practitioner to seek a resolution.
- Disagreements regarding a medical treatment can be referred to an independent medical practitioner or occupational health consultant in appropriate circumstances.
- If an employee is unable to return to work in their former position, a number of alternative arrangements will be discussed with the ill/injured employee. These may include, but are not limited to, retraining, redeployment, accessing short- or long-term disability benefits or retirement.

Human Resources will:

- Assist the injured/ill employee to remain at work or return to work, consistent with medical advice
- With the employee's consent, obtain accurate information about the medical condition and limitations that apply to the particular employee
- Obtain written consent from the employee to communicate with health care professionals involved in the employee's care (when applicable)
- Obtain as much information as possible about the employee's role and the essential and marginal tasks of their job, what is required for the employee to get to and from the workplace, how the employee accesses facilities in the workplace, washrooms, kitchen, etc.
- Obtain the support of the treating medical practitioner and the employee in completing the Functional Abilities Form
- Provide confidential support and counselling services to employees who are affected by

personal or work-related issues

• Communicate this policy and what to expect when an illness or injury occurs to employees in orientation and on a case-by-case basis as appropriate.

#### Employees will:

- Be in breach of their obligations where they:
  - Are considered to gain minimal or no benefit from continued workplace rehabilitation and return-to-work processes
  - Fail to engage in rehabilitation and return-to-work processes
  - Fail to comply with recommendations of the rehabilitation and return-to-work plan or any other recommendations made by the rehabilitation and return-to-work team
  - Withdraw from the disability management program and rehabilitation and return-to-work plan
  - Prevent work-related injury and illness by complying with the requirements of the *Ontario Occupational Health and Safety Act* and with health and safety policies, procedures, practices, and protocols and legislation appropriate to their scope of work
  - Seek appropriate medical treatment (e.g., first aid) in the event of a work-related injury
  - Actively participate in rehabilitation/return-to-work processes in order to resume normal duties as soon as practicable after illnesses or injury in accordance with medical advice
  - Where possible, maintain regular contact with the manager/supervisor with particular emphasis on informing them of any deterioration in condition or unexpected issues
  - Report any injury occurring at work as soon as possible to the manager/supervisor, follow incident reporting procedures, and participate in any follow-up investigation
  - Advise treating medical practitioners of the availability of a rehabilitation/return-to-work process and ask them to complete the Functional Ability Form
  - Encourage co-workers to support injured/ill employees and informing them of the progress of the rehabilitation/return-to-work process on a "need to know" basis with the injured/ill employee's consent
  - Encourage co-workers to be actively involved in a positive manner wherever possible to support the rehabilitation/return-to-work process

#### Redeployment

The accessibility needs of employees with disabilities, along with individual accommodation plans, will be taken into account in the event of redeployment.

## 5. DESIGN OF PUBLIC SPACES STANDARDS

Carefirst is committed to ensuring that public spaces and off-street parking facilities are accessible to everyone. Carefirst will comply with all applicable requirements under the Design of Public Spaces Standards of the Integrated Accessibility Standards Regulations when constructing new or redeveloping public spaces.

#### NON-COMPLIANCE

Failure to comply with this policy and its associated procedures may result in appropriate disciplinary measures up to and including termination of employment.

#### AMENDMENTS

Carefirst reserves the right to revise, amend, or remove this policy at any time. In cases of dispute, the decision will be made at Carefirst's discretion. However, in no case shall an employee be provided with less than their statutory entitlements.

# REFERENCES

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11, Ontario Regulation 429/07, Accessibility Standards for Customer Service). O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS

Accessibility Standards for Customer Service (Ontario Regulation 429/07)

Accessible Customer Service Standard Changes Quick Reference Guide (Quick Reference Guide July 1, 2016 (003).pdf <u>ontario.ca/accessibility</u>

Blind Persons' Rights Act, R.S.O. 1990, c. B.7, R.R.O. 1990, Reg. 58: GUIDE DOGS

Changes to Ontario's Accessible Customer Service Standard: Toolkit (Customer Service Standards Toolkit ECP (2016-06-07)FINAL <u>ontario.ca/accessibility</u>

CHATS Accessibility for Ontarians with Disabilities (AODA) Customer Service Standards Policy, September 30, 2011

Compliance Manual: Accessibility Standards for Customer Service, Ontario Regulation 429/07, Ministry of Community and Social Services

Dog Owners' Liability Act, R.S.O. 1990, c. D.16

Enabling Non-Profits Ontario Website and related products (e.g. Training Resource for Small Businesses and Organizations)

Food Safety and Quality Act, 2001, S.O. 2001, c. 20, O. Reg. 31/05: MEAT

Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07, Ministry of Community and Social Services

Health Protection and Promotion Act, R.S.O. 1990, c. H.7, Ontario, R.R.O. 1990, Reg. 562: FOOD PREMISES

Ontarians with Disabilities Act, 2001

Ontario Human Rights Code

Ontario Regulation 31/05