



Providing Access for People with Disabilities

Introduction

Principles

Med-Health Laboratory (MHL) is committed to fostering a healthy and positive environment that recognizes and respects the personal worth, dignity and diversity of each member of the laboratory community and its clientele. MHL is committed to meeting the needs of people with disabilities in a timely manner. [MHL 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.](#)

Purpose

- This policy ensures that all members of the MHL are aware of the benefits of achieving accessibility for people with disabilities; and know the rights and responsibilities of employees, physicians, students, volunteers, patients and other clients with regard to accessibility and client service;
- Consistent with MHL Mission and Values, this policy establishes accessibility standards at MHL in accordance with the Accessibility for Ontarians with Disabilities Act, 2005, and in keeping with Ontario Regulation 429/07 and 191/11, the Canadian Charter of Rights and Freedoms, and the Human Rights Code;
- This policy, which is pursuant to O. Reg. 429/07, s. 3 and O. Reg. 191/11, s.3 is designed to bring about systemic and organizational change that will foster a healthy, respectful and positive work environment by accomplishing the following objectives:
 - Outline the steps required to implement MHL's accessibility plan to achieve equity, fairness, and due process as articulated in its Mission and Values;
 - Foster a positive work environment through proactive measures, barrier-free systems analysis and enforcement;
 - Ensure that all members and clients of the MHL are treated equitably and with dignity and respect; Address breaches of this policy and settle disputes quickly, fairly and as close to the source as possible;
 - Ensure that all members of the MHL community are aware of their rights and responsibilities under this policy; and Provide proactive education and organizational training and development aimed at providing an environment that is healthy, respectful, welcoming, accessible, and free of discrimination and/or harassment.
- This document shall be made readily available online and provide a copy in an accessible format upon request.

Application

This policy applies to all persons that are employed or otherwise formally associated with MHL, AND are authorized by MHL to deliver services to the public on its behalf.

Questions about the Policy

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of the policy is not understood, an explanation should be provided by, or referred to, the Manager, Quality Management.

Policy Statement

- People with disabilities will have [equal access and opportunity](#) to obtain, use, and benefit from all services (and goods associated with services: e.g. laboratory services offered to the public by MHL).
- Services will be provided in a manner that respects the [dignity and independence](#) of people with

Authorized by: Laboratory Director/ Manager

Authorized Date: 1/15/2024

This is a 'controlled' document. Any documents appearing in paper form that are not on blue coloured stock paper are not controlled and should be checked against the original document on blue paper or the master electronic current version.



disabilities.

- All individuals covered by this policy will communicate with people with disabilities in ways that take into account their disability, and individual needs. This may include:
 - Interpretive services
 - Sign language (instructions for patients)
 - Communication board
 - Mobility aids
- Services provided by MHL to people with disabilities will be integrated as fully as possible into existing service delivery procedures, and will allow people with disabilities to benefit from the same services as other people, delivered in a similar way.
- [The MHL's accessibility plan is posted MHL website in accessible format. The plan is reviewed annually for health & safety report; and updated at least once every five years, or earlier if required.](#)
- People with disabilities have the right to use their own personal assistive devices while accessing the services provided by MHL, unless there is a defined risk associated with that use. The designated MHL healthcare provider of the person with disability will communicate any anticipated risk before the onset of expected service delivery, and alternative measures will be explored as necessary.
- People with disabilities may be accompanied by their Service Animal while in those areas of MHL that are normally open to the public, unless the animal is excluded by law (e.g. food preparation areas) or public health concern. The designated MHL healthcare provider of the person with disability will communicate any anticipated exclusions or public health concerns before the onset of expected service delivery, and alternative measures will be explored as necessary.
- People with disabilities who are accompanied by a support person have the right to access their support person while utilizing services provided by MHL, unless such access conflicts with established practices for healthcare delivery and/or privacy. The designated MHL healthcare provider of the person with disability will communicate any anticipated conflicts before the onset of expected service delivery, and alternative measures will be explored as necessary.
- Public notice will be provided in the event of any planned or unexpected disruption to the services offered, or facilities located within, MHL, or in a manner that takes into account the needs of disabled persons.
- All individuals covered by this policy will receive duty specific training on providing customer service to people with disabilities.
- People with disabilities will have the option of providing feedback on the degree to which their accessibility needs were met while obtaining services from MHL. MHL will aim to resolve any accessibility deficiencies noted by this feedback process.

Associated Procedure

Customer Service Standards

- Pursuant to O. Reg. 429/07, s. 4, access to goods or services will be provided to members of the public or other third parties at premises owned or operated by MHL.

If a person with a disability is accompanied by a guide dog or other service animal, MHL shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with them.

While MHL will strive to make all reasonable accommodations, the owner of the Service Animal is ultimately responsible for its care and supervision. MHL cannot accept liability for any Service Animal's care or well-being while its owner is accessing services at MHL.

Emergency situations where a service animal's owner can no longer care for his or her animal will be

Authorized by: Laboratory Director/ Manager

Authorized Date: 1/15/2024

This is a 'controlled' document. Any documents appearing in paper form that are not on blue coloured stock paper are not controlled and should be checked against the original document on blue paper or the master electronic current version.



handled on a case-by-case basis. However, MHL cannot accept liability for the care or well-being of the Service Animal.

In situations where the presence of a Service Animal could seriously impact the health and/or safety of another patient/visitor at MHL, the manager/designate will analyse all options for safely allowing the Service Animal to stay with its owner. Some of the options to consider may be creating distance between the animal and the individual(s) affected by its presence, eliminating in-person contact, changing the time the individual and the Service Animal's owner receive service, using air purifiers, or other measures that would offer the Service Animal's owner equal opportunity to obtain service from MHL.

Where a Service Animal is excluded by law, MHL will aim to provide other measures to the person with a disability to obtain, use and benefit from the services offered.

If it is not apparent that an animal is being used for reasons relating to a person's disability, MHL staff may request a letter from a physician or nurse confirming that the animal is needed for reasons relating to a disability, or a certificate confirming that the animal has been trained by a professional Service Animal institution.

The Service Animal must be clean and in good health, with proof of applicable immunization available upon request.

- Pursuant to O. Reg. 429/07, s. 4, if a person with a disability is accompanied by a support person, MHL shall ensure that both persons are permitted to enter the premises together and that the person with disability is not prevented from having access to the support person while on premises.

MHL may limit a support person's access to their charge on the basis of medical or safety considerations. For example, if a designated support person has a communicable illness and it is likely that they will put others at risk due to their illness, they may be denied access to their charge and/or to other areas of the MHL.

If a person with a disability is deprived of access to their support person for this reason, MHL will assume responsibility for the basic care of the disabled individual. If possible, situations requiring the separation of the individual and support person will be discussed with the two parties in advance and measures to minimize the effect of the separation will be taken.

MHL may require the presence of a support person if it is deemed by healthcare staff that significant amount of risk is incurred by the disabled person who is attempting to access MHL service's without assistance.

MHL staff will observe established practice with respect to privacy and patient confidentiality, unless the individual receiving care consents to the support person being privy to their medical information.

- Pursuant to O. Reg. 429/07, s. 5 and O. Reg. 191/11, s. 13, notification about planned disruptions will include information about the reason for the disruption, its anticipated duration and instructions on accessing alternative facilities or services, if available.

MHL will endeavour to provide notice either directly to clients and/or through posted signage at the site of the disruption as well as other conspicuous locations within MHL (to be posted by Security), and/or through updates on the MHL internal and external websites, as required. For unexpected disruptions, MHL will follow the above procedure on a "best efforts" basis.

- Pursuant to O. Reg. 429/07, s. 6 and O. Reg. 191/11, s.7, several methods will be used when providing training including an information guide/booklet, an online training course sourced from the Ontario Ministry of Community and Social Services, and in-service education as appropriate to job roles and functions.

Training will include:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard;

Authorized by: Laboratory Director/ Manager

Authorized Date: 1/15/2024

This is a 'controlled' document. Any documents appearing in paper form that are not on blue coloured stock paper are not controlled and should be checked against the original document on blue paper or the master electronic current version.



- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to access an in-house resource on how to use the equipment or devices available at MHL that may help with the provision of goods or services to people with disabilities, e.g. bell relay, accessible washrooms, ASL interpretation; and
- What to do if a person with a disability is having difficulty in accessing MHL's services.
- MHL's policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

The training will be disseminated as follows:

- Packaged training presentation for supervisors to deliver to their teams;
- On-line documents, E-learning modules: [Working Together – The Code and the AODA \(5-parts\)](#)
[Doc Mgmt Software-PARADIGM: MHL AODA docs in QSE folder: Facilities & Safety](#)
- In-person training session offered by a facilitator from Quality & Risk Management; and
- A customized training session/instructional tips arranged by the manager with a facilitator from Risk Management/Safety with the same content as the previous item/documents.

These methods may be supplemented with a customer service booklet to use for ongoing reference. After initial roll-out, training will be provided to new staff at orientation. All third party contractors and volunteers will receive the MHL Customer Service booklet prior to commencement of their engagement at MHL.

The training will be recorded as follows:

- Completion of the online training or in-person staff (class room) course will be recorded as applicable/available.
- Attendance at orientation will be recorded through QMS team and records filed in personnel records.
- Volunteer/Student training will be recorded.
- Individual supervisors will record attendance at training offered through staff meetings, as applicable.
- Physicians/medical consultants will receive training via electronic presentation and their participation will be recorded.
- Pursuant to O. Reg. 429/07, s. 6, MHL staff will have knowledge of the assistive devices available at the MHL and/or have access to staff members with knowledge regarding the appropriate use of the device. Assistive devices include, but are not limited to, mobility and lifting devices, as well as communication aids such as TTY phones, etc. as applicable.
- Pursuant to O. Reg. 429/07, s. 7, MHL has implemented a process to receive feedback on the provision of services provided by MHL to people with disabilities. The MHL Patient Relations office (QMS) will work with clients to determine a process for responding to feedback and will coordinate a response from the health care team. Any staff receiving comments/feedback may refer people to MHL QMS team.

The Patient Relations Staff (QMS) are committed to maintaining confidentiality and responding to feedback in a timely way. With advance notice, in-person meetings can be arranged with translation services and sign language interpreters as needed. [Please refer to MHL feedback procedure.](#)

The process for responding to feedback on how MHL provides goods and services to people with



disabilities is as follows:

Patients

1. The feedback will be received by a member of the MHL health care team (staff);
2. The member of the health care team will respond;
3. If the concerns require further attention, the person will contact the MHL mgmt office ; and
4. The concern will be managed via the standard process used for patient concerns.

Visitors

Visitors will address their concerns through the mgmt office

Employees/Contractors/Third Party agents

1. The feedback will be received by the supervisor of the area; and
2. If the concerns require further attention, the person will contact the MHL manager. designated
3. Pursuant to O. Reg. 429/07, s. 8, MHL shall notify persons whom it provides goods or services that documents required by this Regulation are accessible on the MHL external website.
4. Pursuant to O. Reg. 429/07, s. 9, MHL shall provide the information contained this document to a person with a disability in an accessible format upon request.

MHL employs any persons with disabilities, appropriate individualized workplace emergency response information is prepared.

The individualized workplace emergency response information (as applicable) include the following:

- When the employee moves to a different location in the organization?
- When the employee’s overall accommodation needs or plans are reviewed?
- When MHL reviews its general emergency policies?

MHL, with the employee’s consent, will provide the workplace emergency response information to the person designated to provide assistance to the employee. The individualized workplace emergency response information provided as soon as practicable after management becomes aware of the need for accommodation due to the employee’s disability.

General Integrated Standards

Pursuant to O. Reg. 191/11, s. 4, MHL shall establish, implement, and maintain a multi-year accessibility plan document. The accessibility plan will outline how MHL will achieve accessibility through the Integrated standards.

MHL shall prepare an annual status report, and shall be made available on the website and provide a copy in an accessible format upon request. The MHL Accessibility Plan (See Appendix A) shall be reviewed and updated at least once every five (5) years by the Accessibility Action Committee, beginning in 2014.

MHL shall notify persons whom it provides goods or services that the Accessibility Plan required by this Regulation is accessible on the MHL external website.

MHL shall provide the information contained the Accessibility Plan to a person with a disability in an accessible format upon request.

Pursuant to O. Reg. 191/11, s. 5, MHL will incorporate accessibility criteria and features when

Authorized by: Laboratory Director/ Manager

Authorized Date: 1/15/2024

This is a `controlled` document. Any documents appearing in paper form that are not on blue coloured stock paper are not controlled and should be checked against the original document on blue paper or the master electronic current version.



procuring or acquiring goods, services, or facilities, except where it is not practical to do so.

Pursuant to O. Reg. 191/11, s. 6, MHL will incorporate accessibility criteria and features when procuring self-serve kiosks, except where it is not practical to do so.

Definitions

Accessible Format: A format that may include, but not limited to, large print, recorded audio, and electronic format, Braille, and other formats used by persons with disabilities (AODA, 2005.)

Assistive Devices: Devices used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by this standard. Assistive devices include, but are not limited to, wheelchairs, reading machines, recording machines, hearing devices and devices for grasping, canes (AODA, 2005).

Barrier: 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 informational or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice

Disability according to the AODA (2005):

- 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 a 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.

Note: Disabilities can be visible as well as non-visible; of different severity, the effects of a disability may come and go.

For Example:

- A person with arthritis has a disability that over time may increase in severity.
- A person with a brain injury has a disability that is not visible.
- A person with multiple sclerosis has a disability that causes her to experience periods when the condition does not have an effect on her daily routine and other periods when it does.

Service Animals: An animal who accompanies a person with a disability as they are used by the person for reasons relating to their disability. Service animals may accompany people with physical (sight, hearing), cognitive or seizure-related disabilities, among others.

In most cases it will be obvious that an animal is being used for reasons relating to a person’s disability. If it is not apparent, the person will usually have a letter from a physician or nurse confirming that the animal is needed for reasons relating to a disability, or a certificate confirming that the animal has been trained by a professional service animal institution. Service animals should not be confused with “pet therapy” animals, which are used to provide comfort and motivation.

Support Persons: An individual who accompanies a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services. The support person could be a paid personal support worker, a volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications (AODA, 2005).



MED-HEALTH LABORATORIES LTD.
1216 Lawrence Ave West, Toronto, ON-M6A 1E2

Section:	Safety Policy & Procedures
Document Name:	AODA- Policy and Procedure
Document ID:	9242
Status:	Current
Version:	1.3

References:

Ontario Ministry of Economic Development, Trade and Employment – website:

<http://www.mcsc.gov.on.ca/en/mcsc/programs/accessibility/customerService/Over20.aspx>

Ontario Ministry of Seniors and Accessibility-

- Compliance update effective as of July 01, 2016: `Accessible Customer Service Standard and Integrated Accessibility Standards.
- [Accessibility for Ontarians with Disabilities Act, 2005. Ontario Regulations 191/11.](#)
- [Training Modules \(5-parts\) from the Ontario Human Rights Commission. Working Together: The Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act.](#)

Authorized by: Laboratory Director/ Manager

Authorized Date: 1/15/2024

This is a `controlled' document. Any documents appearing in paper form that are not on blue coloured stock paper are not controlled and should be checked against the original document on blue paper or the master electronic current version.