



ACCESSIBILITY POLICY

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Revision Record

Revision	Reason for Issue	Issue Date	Issued By
1	Original Issue	April 2015	A. McKechnie
2	Minor Revisions – Company contact information	September 2018	A. McKechnie

1.0 CUSTOMER SERVICE STANDARD

POLICY

Clearwater Clinical Limited (“Clearwater”) is committed to using reasonable efforts to ensure it provides accessible customer service to people with various kinds of disabilities and respects the core principles of independence, dignity, integration and equal opportunity.

PURPOSE

This policy has been developed to comply with Accessible Standards for Customer Service. The Accessible Standards for Customer Service aims to establish accessibility standards for people with disabilities.

SCOPE AND APPLICATION

The Accessibility Standard for Customer Service policy governs Clearwater’s provisions of goods and services to members of the public or other third parties including all business partners. The standard applies to Clearwater employees and contracted employees.

DEFINITIONS

"Assistive Device" any piece of equipment a person with a disability uses to help him or her with daily living. Personal assistive devices include, but are not limited to, wheelchairs, hearing aids, white canes or speech amplification devices.

"Disability" (a) 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 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 (Ontario).

"Guide Dog" a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations under the Blind Persons’ Rights Act (Ontario).

"Service Animal" any animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or where the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability.

"Support Person" a person who accompanies a person with a disability in order to help him or her with daily tasks, such as communication, mobility, personal care or medical needs or with access to goods or services. The support person may be a paid support worker, a volunteer, a friend or a family member; the support person does not need to have special training or qualifications.



CORE PRINCIPLES AND PURPOSE OF CUSTOMER SERVICE STANDARD

Clearwater will use reasonable efforts to ensure the provision of its goods and services are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Providing goods and services in a manner that respects the dignity and independence of persons with disabilities;
- Providing goods and services so that persons with disabilities are able to fully benefit from the same services, in the same place, and in the same or similar way as persons without disabilities, unless an alternative measure is necessary to enable a person with a disability to obtain, use, or benefit from Clearwater's goods and services; and
- Giving people with disabilities the same opportunity equal to that of persons without disabilities to obtain, use or benefit from Clearwater's goods and services.

USE OF ASSISTIVE DEVICES

Clearwater permits persons with disabilities to use their personal assistive devices while on Clearwater premises to obtain, use, or benefit from Clearwater's goods and services.

COMMUNICATION

When communicating with a person with a disability, Clearwater will do so in a manner that takes into account the person's disability.

USE OF SERVICE ANIMALS AND SUPPORT PERSONS

Service Animals: Persons with disabilities who are accompanied by guide dogs or other services animals will be permitted to enter Clearwater's premises that are open to the public with the animal and will be allowed to keep the animal with them, unless the animal is otherwise excluded by law. If the service animal is excluded by law, Clearwater will use reasonable efforts to ensure that alternate means are available for persons with disabilities to obtain, use or benefit from Clearwater's goods and services. If it is not readily apparent that the animal is a service animal, Clearwater may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability.

It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

Support Persons: Persons with disabilities who are accompanied by a support person will be permitted to enter Clearwater premises that are open to the public and will not be prevented from having access to the support person while on the premises.

Clearwater may require a person with a disability to be accompanied by a support person while on Clearwater premises in situations where it is deemed necessary to protect the health and safety of the person with a disability and/or others.

When support persons are required for Clearwater sponsored meetings or events, the person with a disability will be required to provide his or her own support person. If there are fees associated with the meeting or event, the support person will be charged the regular fee unless otherwise specified by Clearwater. Advance notice of said fees will be provided if such circumstances exist.

NOTICE OF TEMPORARY DISRUPTIONS

Clearwater will make reasonable efforts to provide notice to persons with disabilities in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. If the disruption is anticipated, Clearwater will provide a reasonable amount of advance notice of the disruption. If the disruption is unexpected, notice will be provided as soon as possible. The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

TRAINING

Clearwater will provide training to employees, volunteers and others who deal with the public or third parties on their behalf. Training will be provided as soon as is practicable after hire or engagement.

Training will include:

- An overview of any pertinent Accessibility legislation and the requirements of the standards;
- Clearwater's plan related to the customer service standard;
- How to interact and communicate to 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;
- What to do if a person with a disability is having difficulty in accessing Clearwater's goods and services;
- When applicable, training on any equipment or devices on site that may assist persons with disabilities in accessing goods and services.

Additional training will be provided to notify employees/others when changes are made to the policy.

Employees responsible for the development of the Accessibility Policy will also receive the required accessibility training.

FEEDBACK PROCESS

Clearwater is committed to providing high quality goods and services to all members of the public that it serves, including customers with disabilities. Comments on how well Clearwater achieves this goal are welcomed and appreciated.

Feedback from members of the public regarding the way Clearwater provides goods and services to people with disabilities can be made by telephone, in person, in writing, in electronic format (e.g. e-mail) or through other relevant methods.

All feedback will be directed to the company at:

80 Aberdeen Street, Suite 301, Ottawa, Ontario K1S 5R5

Tel: 613-728-6666

Email: hr@clearwaterclinical.com

Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve Clearwater services. In most cases, a response to the feedback will be provided within 30 working days. Feedback and/or responses will be delivered in a format that is accessible to the complainant.

2.0 INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)

POLICY

Clearwater is committed to using reasonable efforts to ensure it achieves the accessibility needs of person with disabilities in the provision of information and communications in its hiring and employment practices.

PURPOSE

This policy has been developed to comply with the Integrated Accessibility Standards Regulations, specifically:

- Addressing barriers that persons with disabilities face in the areas of information and communications, and employment.
- Training employees and anyone who provides goods or services on behalf of Clearwater, and those who participate in developing the organization's policies, on accessibility standards and the Human Rights Code as it pertains to persons with disabilities.

SCOPE AND APPLICATION

This policy governs how Clearwater will achieve accessibility needs of person with disabilities in the provision of information and communications in its hiring and employment practices.

The policy applies to Clearwater employees and contracted employees, and to all persons who participate in the development of Clearwater's policies, practices and procedures governing information and communications and recruitment and employment.

DEFINITIONS

"Information" includes data, facts and knowledge that exists in any format including text, audio, digital or images, and that conveys meaning.

"Communications" means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

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

"Communication supports" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications



CORE PRINCIPLES AND PURPOSE OF INTEGRATED STANDARDS FOR ACCESSIBILITY

This policy addresses the following:

1. Accessible Formats and Communication Supports
2. Individualized Emergency Support Plan
3. Employment
 - a) Recruitment
 - b) Informing Employees of Supports
 - c) Accessible Formats and Communication Supports for Employees
 - d) Performance Management
 - e) Career Development and Advancement
 - f) Redeployment
4. Training

1. Accessible Formats and Communication Supports

Clearwater will, upon request, provide or arrange for the provision of accessible formats and communications supports for persons with disabilities:

- a. In a timely manner that takes into account the person's accessibility needs;
- b. At a cost that is no more than the regular cost charged to other persons;
- c. Consult with the person making the request in determining the suitability of an accessible format or communication support.

Exceptions, the IASR does not apply to:

- a. Product and product labels
- b. Unconvertible information and communications
- c. Information that Clearwater does not control directly or indirectly through a contractual relationship

2. Individualized Emergency Support Procedures

Clearwater will provide individualized workplace emergency response information to employees who have a disability if necessary and when Clearwater is aware of the need for accommodation due to the employee's disability.

If the employee who received individualized emergency response information requires assistance, and with the employee's consent, Clearwater will provide the emergency response information to the person designated by the employer with the employee's consent. Clearwater will provide this information as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

Clearwater will review the individualized workplace emergency response information when:

- a. The employee moves to a different location in the organization;
- b. The employee's overall accommodations needs or plans are reviewed
- c. When Clearwater reviews the general emergency response policies

3. Employment

a. Recruitment:

- Notify its employees and the public about the availability of accommodation for applicants with disabilities in our recruitment process.
- Job applicants who are selected to participate in an assessment or selection process including testing (if required), will be notified that accommodations are available upon request.
- Suitable accommodations in relation to the materials or processes to be used will be made.
- On request, Clearwater will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.
- When making offers of employment, Clearwater will notify the successful applicant of Clearwater's policies for accommodating employees with disabilities

b. Informing employees of supports

- Clearwater will inform employees of the policies to support employees with disabilities, including policies on the provision of accommodations that take into account an employee's accessibility needs due to disability.
- Clearwater will meet with employees as requested, to provide or arrange for the provision of accessible formats and communication supports for information required for jobs or generally available in the workplace.

c. Accessible Formats and Communication Supports for Employees

- Clearwater will, upon request, provide or arrange for the provision of accessible formats and communications supports for persons with disabilities for:
 1. Information to perform their jobs
 2. Information that is generally available to employees in the workplace

d. Performance Management

- Clearwater will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when using our performance management process in respect of individuals with disabilities, including:
 1. Information that is needed to perform the employee's job
 2. Information that is generally available to employees in the workplace
 3. Consult with the employee making the request in determining the suitability of an accessible format or communication support

e. Career Development and Advancement

- Clearwater will take into account the accessibility needs of our employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to our employees with disabilities.

f. Redeployment

- When Clearwater uses redeployment as an alternative to layoff, and reassigns employees to other jobs or departments within the organization, Clearwater will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.



4. Training

Clearwater will provide training to employees, volunteers and others who deal with the public or third parties on their behalf.

Training will include:

- An overview of any pertinent Accessibility legislation and the requirements of the standards
- Clearwater's plan related to provision of information and communications in its hiring and employment practices.
- What to do if a person with a disability requires support accessing these practices.

Additional training will be provided to notify employees/others when changes are made to the policy.

Employees responsible for the development of the Accessibility Policy will also receive the required accessibility training.

FEEDBACK PROCESS

Clearwater is committed to providing accessible information and support to employees and employment candidates with disabilities. Comments on how well Clearwater achieves this goal are welcomed and appreciated.

Feedback from employees and candidates with disabilities can be made by telephone, in person, in writing, in electronic format (e.g. e-mail) or through other relevant methods.

All feedback will be directed to:

80 Aberdeen Street, Suite 301, Ottawa, Ontario K1S 5R5

Tel: 613-728-6666

Email: hr@clearwaterclinical.com

Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve Clearwater services. In most cases, a response to the feedback will be provided within 30 working days. Feedback and/or responses will be delivered in a format that is accessible to the complainant.

QUESTIONS OR CONCERNS ABOUT THE CLEARWATER ACCESSIBILITY POLICY

Employees may address any questions or concerns:

Human Resources

Tel: 613-728-6666

Email: hr@clearwaterclinical.com

For more information on applicable Ontario provincial standards:

Accessibility for Ontarians with Disabilities Act (AODA)

<http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/index.aspx>

POLICY REVIEW

This policy will be reviewed at least annually.