



Workplace Accessibility Policy

The Ottawa Memory Clinic/Clinique de la Mémoire de L'Outaouais ("OMC/CMO") is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

The Accessibility for Ontarians with Disabilities Act ("AODA") seeks to ensure that all Ontarians have fair and equitable access to programs and services and to improve opportunities for persons with disabilities.

This Workplace Accessibility Policy outlines the formal standards that OMC/CMO has put in place to comply with AODA and also provides guidelines that employees and the OMC/CMO need to follow in order to comply with the Act which serves to identify, remove and prevent barriers (Appendix A) in the workplace for people with disabilities. Although this Act applies to Ontarians, OMC/CMO has decided to adapt the principles in all the clinics regardless of province.

1.0 Purpose

The purpose of this Policy is for OMC/CMO to comply and meet the requirements of Accessibility for Ontarians with Disabilities Act, 2005 (AODA), introduce the Act to employees at OMC/CMO and provide guidance and guidelines when interacting with others with disabilities.

2.0 Policy Statement

This Policy will outline the scope, definitions, principles, accessibility standards, responsibilities, training and feedback that the Clinics need to follow in order to comply with the AODA.

OMC/CMO will provide training to all employees including those who interact with individuals, patients, clients, contractors, students, volunteers, suppliers and/or other third parties with disabilities. OMC/CMO welcomes feedback on how the clinics provided services to people with disabilities.

3.0 Scope

The Workplace Accessibility Policy will apply to all employees (full-time, part-time, temporary), individuals, patients, clients, contractors, students, volunteers, suppliers and/or other third parties.



4.0 Definitions

“Assistive Devices”: devices that people bring with them, such as walkers, magnifiers, or oxygen tanks. Assistive devices that the Clinic might provide may include: assistive software for people with visual, hearing or mobility impairments, wheelchairs or TTY (telephone teletype), real-time captioning or assistance from a staff person.

“Barrier”: anything that prevents a person with a disability from fully participating in all aspects of society because of a policy, practice or barrier including physical, architectural, information or communications, attitudinal, and/or technological barrier.

“Disability”: used in the Accessibility for Ontarians with Disabilities Act (AODA) is from the Human Rights Code and means any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and 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, 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.

“Guide Dog”: a highly trained working dog that provides mobility, safety and increased independence for people who are blind.

“Service Animals”: animals that are individually trained to perform tasks for people with disabilities, such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks. An animal is qualified to be a service animal if it is readily apparent the animal is used by the person for reasons relating to their disability; or the person provides a letter from a physician or nurse confirming the person requires the animal for reasons relating to the disability.

“Support Person”: is an individual hired or chosen to assist a person with a disability, to provide services or assistance with communication, mobility, personal care, medical needs, or access to services. This may be a professional, relative, volunteer or friend.



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5.0 Accessibility for Ontarians with Disabilities Act (“AODA”) Principles

The four (4) principles of the AODA are:

- *Dignity* – treating people with disabilities with respect and not forcing them to accept lesser service, quality or convenience
- *Independence* – ensuring people with disabilities can do things on their own without unnecessary help or interference from others
- *Integration* – providing services in a way that allows people with a disability to benefit from the same services, in the same place and in the same or similar way as other people, unless an alternate measure is necessary to enable the person to access goods and services
- *Equal Opportunity* – having the same chances, options, benefits and results as others. In the case of services, it means that people with disabilities have the same opportunity as others to benefit from the way goods and services are obtained. They should not have to make significantly more effort to access or obtain service or have to accept lesser quality or more inconvenience.

6.0 Accessibility Standards

This Workplace Accessibility Policy addresses the following accessibility standards:

a. Provision of Services

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

- ensuring that all people receive the same value and quality
- allowing individuals with disabilities to do things in their own way and at their own pace when accessing services as long as this does not present a safety risk
- using alternative methods when possible to ensure that individuals with disabilities have access to the same services, in the same place and in a similar manner
- taking into consideration individual needs when providing services; and
- communicating in a manner that takes into consideration the individual’s disability.



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b. Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing information/services provided by OMC/CMO.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of information and/or services.

c. Guide Dogs and Service Animals

An individual with a disability that is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public or/and utilized for the purpose(s) of conducting approved business (scheduled meetings, etc.).

Exclusion Guidelines:

If a guide dog or service animal is excluded by law (municipal by-laws governing banned breeds for example), OMC/CMO will offer alternative methods to enable the person with a disability to access information and/or services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Care and Control of the Animal:

The individual that is accompanied by a guide dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies:

OMC/CMO will make all reasonable efforts to meet the needs of all individuals if a health and safety concern is present (i.e. severe allergy to the animal).

d. Support Persons

If an individual with a disability is accompanied by a support person, OMC/CMO will ensure that both persons are allowed to enter the premises together and that the individual is not prevented from having access to the support person.

There may be times where seating and availability prevent the individual and support person from sitting beside each other. In these situations, OMC/CMO will make every reasonable attempt to resolve the issue and accommodate all parties.

In situations where, confidential information might be discussed, consent will be obtained from the individual and the support person (as circumstances dictate), prior to any conversation, meeting, information sharing taking place.



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e. Employment

OMC/CMO is committed to welcoming people with disabilities with respect to recruitment, employment, training, career development and career progression. OMC/CMO will advertise all jobs which allow persons of all abilities to identify opportunities and apply for vacant positions.

All job applications will be notified verbally or in writing of the availability of accommodations for applicants with a disability that may or may not be visible. Candidates will be informed that accommodations will be available upon request during the recruitment process, interviews and/or wherever it is applicable during the whole recruitment cycle.

All successful candidates will be notified that policies and supports are in place for accommodating people with disabilities and individual accommodations plans can be implemented on a case by case basis.

f. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of OMC/CMO. In the event of any temporary disruption (planned or unexpected) to the facilities or services that individuals with disabilities rely on to access or use OMC/CMO services, reasonable efforts will be made to provide advance notice to the public. In some circumstances such as, in the situation of unplanned temporary disruptions, advance notice may not be possible.

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

- services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options.

When disruptions occur, OMC/CMO will post notice in front lobby and/or an obvious place, on a website and any other reasonable method under the circumstance.



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7.0 Responsibilities

Employee's Responsibilities

- Permit the person with a disability to use their own assistive devices on the premises
- Communicate with a person with a disability in a way that it will take into consideration their disability
- Accommodate a person with a disability and their service animal or support person, and arrange for a suitable meeting place
- Notify or post information about a planned or unexpected disruption of the facilities.

OMC/CMO Responsibilities

- Train new and existing employees to serve customers of all abilities
- Keep a written record of the training
- Welcome service animals and support persons on the premises
- Create accessible ways for people to provide feedback
- Provide publicly available emergency information, like evacuation plans or brochures, in an accessible format when asked.

8.0 Training

OMC/CMO will provide training to all employees including those who interact with patients, clients, customers, suppliers and/or other third parties.

Training will include:

- An overview of the AODA
- OMC/CMO's plan related to the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device, a service animal or require a support person
- Information of equipment or devices available on the premises that may help the provision of services to persons with disabilities
- What to do if a person with a disability is having difficulty in accessing OMC/CMO's services.



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9.0 Feedback Process

Individuals can provide feedback regarding how OMC/CMO provides services to people with disabilities by e-mailing the Chief Operating Officer or by verbally providing feedback while at any of the clinics. All comments will be reviewed for improved services and responses can be expected within thirty (30) working days.

For more information on The Accessibility for Ontarians with Disabilities Act (“AODA”) please visit: <https://www.aoda.ca>.



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Acknowledgement and Statement of Compliance

I acknowledge that I have received the Ottawa Memory Clinic/ Clinique de la Mémoire de l'Outaouais (OMC/CMO) Workplace Accessibility Policy that I have reviewed it in detail and I am familiar with the content. I agree to comply with the Policy contained therein, as it may be amended from time to time.

I understand and agree that the document is intended to provide an overview of this Policy but does not necessarily represent ALL of the guidelines, policies and practices in effect.

I am aware of the content of Workplace Accessibility Policy and that subject to all applicable federal and provincial regulations, this Policy may be changed, modified, or updated at any time and that OMC/CMO will notify the employees should any content be changed, modified or updated.

I understand that it is my responsibility, once notified of changes to this Policy, to familiarize myself with any revisions.

To the best of my knowledge, I am not involved in any situation that conflicts or might appear to conflict with this Policy as outlined by the Ottawa Memory Clinic/Clinique de la Mémoire de l'Outaouais. I also agree to immediately notify OMC/CMO of any changes that might adversely affect my compliance with this document.

Employee's Name (print)

Employee's Signature

Date

Please return the signed copy to the Director, COO or President to file.



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10.0 Document History

Date	Approved By	Changes Made
TBD 2025	Richard Bergeron, President	New Workplace Accessibility Policy



Appendix A

Recognizing, Removing and Preventing Barriers

Identifying a barrier starts with knowing that a barrier exists. Removing a barrier means finding a way for everyone to access the information or organization. Preventing a barrier means knowing about possible barriers in advance and designing barrier-free access.

For instance, Sarah has low vision and has a hard time reading some restaurant menus. Her low vision is not the barrier. The barrier is the small print on the menus. When a restaurant gives Sarah a large print menu, she can read it and place her order easily on her own.

Examples of Common Barriers, Examples and Possible Solutions

1. Physical and Architectural Barriers: barriers in the environment prevent access for people with disabilities.
 - Aisles are blocked by filing cabinets or furniture making them too narrow for a person using a wheelchair or walker. *Possible Solutions: Consider the paths that your employees and patients take and ensure event or meeting spaces are accessible including washrooms, lighting and signage.*
2. Informational and Communication Barriers: barriers arise when a person with a disability cannot easily receive and/or understand information that is available to others.
 - Print that is too small to read. *Possible Solutions: Make everyday documents, like signs and menus, easy to read by making sure that the print is legible for most people.*
 - Presentation materials for meetings, such as slide decks and videos, are not accessible to employees with low vision or who have hearing loss. *Possible Solutions: Develop a template for slide decks using large fonts, high contrast colours and clean layout. Provide a visual description of the slides when making a presentation.*



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3. Technological Barriers: barriers arise when a person with a disability cannot easily access information through technological sources that is available to others.
 - Emails or other electronic communications are not accessible to people who use screen readers. *Possible Solutions: Allow Patients to contact you in a variety of ways including telephone, email, TTY or train employees on using the relay service over the phone. Make sure every email is accessible to people who use screen readers and offer alternative methods of communication.*
 - Accepting only online job applications. *Possible Solutions: Welcome job applications in a number of formats.*

4. Organizational Barriers: aspects of policies, practices and procedures that result in people with disabilities being treated differently than others or sometimes excluded altogether.
 - People with disabilities are excluded from events, or included as an after-thought when planning events. *Possible Solutions: Make sure that accessibility is considered when making plans for events and invite attendees to tell you if they have different needs. Consider using an accessibility checklist for events.*
 - Not knowing about the different types of accommodations an employee might need to return to work after an absence due to a disability. *Possible Solutions: Learn about the types of accommodations employees might need. Talking with employees about their specific needs is a good first step.*
 - There is no leadership or accountability for issues related to accessibility for people with disabilities. *Possible Solutions: Designate a point person to implement accessibility policies and procedures.*
 - Procedures may exclude some employees, such as directing maintenance/housekeeping staff to only use certain cleaning products that can cause allergic reactions. *Possible Solutions: Implement a "fragrance-free" policy.*

5. Attitudinal Barriers: These barriers may result with people with disabilities being treated differently than people without disabilities.
 - The Receptionist talks to an individual's support person because they assume the individual with a disability will not understand. *Possible Solutions: Do not assume you know the disability, speak directly to the person.*