


HUMAN RESOURCES POLICY			
Location(s): Canada			
Policy Title:	Accessibility Policy	Policy #:	HR-POL-009
Date Issued:	01-OCT-2023	Version No:	1

1 PURPOSE

Thornhill Medical is committed to ensuring equal access and participation for people with Disabilities and is committed to treating people with Disabilities in a way that allows them to maintain their dignity and independence.

2 SCOPE

This Policy applies to all Thornhill Medical Personnel and is applicable to any activities on or off Thornhill Medical’s work premises that could reasonably be associated with the workplace.

3 DEFINITIONS

“Thornhill Medical” means Thornhill Research Inc.

“Thornhill Medical Personnel” means directors, officers, managers, employees of Thornhill Medical and other individuals providing services to Thornhill Medical, including consultants, contractors, trainees, homeworkers, interns, part-time and fixed term works and agency personnel.

“Third Parties” mean any individuals other than Thornhill Medical Personnel, including customers, suppliers, and visitors.

“Accessible Formats” include, but are not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with Disabilities.


“Accessibility plan” outlines the steps an organization will take to prevent and remove barriers to accessibility and when the steps will be taken.

“Assistive Device” is defined as: a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with Disabilities. Personal Assistive devices are typically devices that a person brings with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

“Barrier” is defined as anything that prevents a person with a Disability from fully participating in all aspects of society.

“Communication Supports” include but are not limited to sign language, plain language and other communication supports that facilitate effective communications.

“Disability or Disabilities” includes a range of conditions, some of which are visible and some not visible. Conditions may have been present from birth, have been caused by an accident, or have developed over time. Disabilities include: visual, hearing, physical, intellectual, learning, and

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mental health.

“Service Animal” is an identifiable working animal, typically wearing a vest or harness, that assists a person with a Disability.

“Support Person” is someone who accompanies a person with a Disability to help with communication, mobility, personal care, medical needs or access to goods, services and/or facilities.

4 POLICY

- 4.01 Thornhill Medical Personnel are expected to treat everyone with dignity and respect in compliance with our *HR-POL-002 Anti-Harassment and Anti-Discrimination Policy*.
- 4.02 Thornhill Medical is committed to complying with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) which was established to ensure people with Disabilities have equal access and are able participate in various environments in a manner that allows them to maintain their dignity and independence.
- 4.03 Thornhill Medical believes in integration, and we are committed to meeting the needs of people with Disabilities in a timely manner. Thornhill Medical will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under applicable legislation.
- 4.04 Thornhill Medical will do its part to ensure that our practices or procedures respect rights and treat people with Disabilities fairly and equitably.
- 4.05 In compliance with the Integrated Accessibility Standards Regulation (IASR), Thornhill Medical will follow several standards to prevent and remove Barriers for individuals with Disabilities:
 - a) **Information and Communication:** Thornhill Medical will communicate with people with Disabilities in ways that take into account their Disability. When asked, Thornhill Medical will provide information about its organization and its services, including public safety information, in Accessible Formats or with Communication Supports.
 - b) **Employment:** Thornhill Medical will notify Thornhill Medical Personnel, potential hires and the public that accommodation can be made during recruitment and hiring. Thornhill Medical will notify Thornhill Medical Personnel that supports are available for those with Disabilities. Thornhill Medical will put in place a process to develop individual accommodation plans for Thornhill Medical Personnel. Where needed, Thornhill Medical will also provide customized emergency information to help Thornhill Medical Personnel with Disabilities during an emergency. Thornhill Medical’s performance management, career development and redeployment processes will take into account the accessibility needs of all Thornhill Medical Personnel.
 - c) **Customer Service:** Thornhill Medical will remove barriers so that individuals with Disabilities can access our goods, services and/or facilities.
 - d) **Design of Public Spaces:** Thornhill Medical will design public spaces (if applicable) to ensure they are developed with accessibility in mind.
 - e) **Training:** Thornhill Medical will train Thornhill Medical Personnel and volunteers in Ontario’s

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accessibility laws and aspects of the Ontario Human Rights Code that relate to persons with Disabilities. Thornhill Medical will train Thornhill Medical Personnel and volunteers on accessibility as it relates to their specific roles.

- f) **Changes to existing policies:** Thornhill Medical will modify or remove an existing policy that does not respect and promote the dignity and independence of people with Disabilities.

5 PROCEDURES

- 5.01 This Policy will be posted on Thornhill Medical's website.
- 5.02 Thornhill Medical will create a written accessibility plan and update it at least once every five years. The plan will be posted on our website.
- 5.03 If there is a planned or unexpected disruption in the facilities or services used by individuals with Disabilities a notice will be posted. This notice will be posted at the entrance of the applicable premises and Thornhill Medical's website. The notice will include the following information: the facility or service that is unavailable, the reason for the disruption, the anticipated duration of the disruption, and alternative facilities or services, if available.
- 5.04 No changes or modifications will be made to this Policy before considering the impact on individuals with Disabilities.
- 5.05 Any policy of Thornhill Medical that does not respect and promote the dignity of people with Disabilities will be modified or terminated.
- 5.06 **Assistive Devices**
Persons with Disabilities may use their own Assistive devices as required when accessing services provided by Thornhill Medical. In cases where the Assistive device presents a safety concern to the customer or employee, or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services.

Thornhill Medical will ensure that Thornhill Medical Personnel are trained and familiar with Assistive devices that are available on our premises including but not limited to: accessible washrooms, increased lighting, and elevators.


When interacting with individuals with Assistive devices, Thornhill Medical Personnel:

- a) will not touch or handle any Assistive device without permission;
- b) will not move Assistive devices or equipment (e.g., canes, walkers) out of a person's reach; and/or
- c) will let individuals know about accessible features in the immediate environment that are appropriate to their needs.

5.07 **Service Animals or Support Persons**

Individuals with Disabilities who are accompanied by a Service Animal are welcome on the parts of our premises that are open to the public and other Third Parties unless the Service Animal is otherwise excluded by law.

When interacting with individuals with Service Animals Thornhill Medical Personnel are expected

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to avoid touching the Service Animal.

Individuals with Disabilities that require a Support Person are allowed to enter Thornhill Medical premises, and at no time will they be prevented from having access to their Support Person.

There may be times where seating and availability prevent an individual and/or Support Person from sitting beside each other. In these situations, Thornhill Medical will make every reasonable attempt to resolve the issue.

In situations where, in the presence of the Support Person, confidential information might be discussed, consent will be obtained by Thornhill Medical from the individual, and, in the case of confidential information of Thornhill Medical, confidentiality undertakings will be obtained by Thornhill Medical from the Support Person, prior to any conversation where confidential information might be discussed.

5.08 **Feedback on this Policy**

Feedback regarding the way Thornhill Medical interacts with and supports individuals with Disabilities can be sent directly to:

Attention: Human Resources Department

Telephone: 416-597-1325

Toll-Free: 1-888-597-1325

Fax: 416-597-1330

Email: info@thornhillmedical.com


Mail/ In Person: 60 Wingold Ave., Toronto, ON, M6B 1P5

Within 10 business days of receiving the feedback, the Human Resources Department will contact the individual providing the feedback and will inform them of the corrective action, if applicable, that will be taken. Additional time may be required for follow-up depending on the format of response required.

6 RESPONSIBILITY

6.01 **All Thornhill Medical Personnel are responsible for:**

- a) Maintaining compliance with this Policy.
- b) Completing mandatory training on the AODA.
- c) Participating in identifying accessibility barriers and planning for barrier removal.
- d) Providing a welcoming environment for individuals with Disabilities, including any person with a Disability using Assistive devices or accompanied by a Support Person or Service Animal.
- e) Communicating with persons with Disabilities in a manner that considers their Disability.
- f) Providing information and communications in Accessible Formats upon request.
- g) Facilitating the process of receiving and responding to feedback about the manner that Thornhill Medical provides goods and services to individuals with Disabilities and ensuring all feedback processes are accessible to persons with Disabilities by providing or arranging for Accessible Formats and Communication Supports upon request.
- h) Facilitating requests for accommodation by individuals with Disabilities in a timely manner, to

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the point of undue hardship.

- i) Requesting support from Management and/or Human Resources when accommodation requests are outside their area of responsibility, or beyond their capacity.

6.02 Managers are responsible for:

- a) Complying with Section 6.01 responsibilities.
- b) Providing leadership in building an inclusive and accessible environment for Thornhill Medical Personnel and Third Parties.
- c) Ensuring that all Thornhill Medical Personnel complete the mandatory AODA training.
- d) Promoting awareness of the Policy within their area of responsibility.
- e) Acting on non-compliant issues within their area of responsibility.
- f) Ensuring Third Parties providing goods, services, and/or facilities have been provided training, either by Thornhill Medical or their own organization.
- g) Consulting with their area Functional Head or Human Resources for assistance with accessibility issues.

6.03 Human Resources is responsible for:

- a) Complying with Section 6.01 and 6.02 responsibilities.
- b) Ensuring resources are budgeted for identifying and preventing accessibility barriers (including attitudinal, systemic, information, communications, and technology, and built environment and public space barriers) and for planning for barrier removal.
- c) Ensuring all Thornhill Medical Personnel complete the required AODA training and that training records are maintained for audit purposes.
- d) Providing oversight for implementation of this Policy and compliance with AODA within area of responsibility

7 REFERENCES AND RELATED POLICIES


Accessibility for Ontarians with Disabilities Act (AODA) 2005
Integrated Accessibility Standards Regulation (IASR) 2016
Ontario Human Rights Code
Canadian Human Rights Act
HR-POL-002 Anti-Harassment and Anti-Discrimination Policy
HR-POL-010 Accommodation Policy

8 FORMS



HR-POL-010 Request for Accommodation Form

VERSION HISTORY:

Previous version	Previous version date	Revision details
N/A	N/A	Replaces all previous policies/ versions.

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POLICY APPROVAL:

Name	Title	Signature	Date
Lesley Gouldie	President and CEO		01-OCT-2023
Steven Beslic	Director, Human Resources		01-OCT-2023