

# AODA

## **Accessibility Policy and Plan**

This 2014-2021 Accessibility Plan outlines what 2540095 Ontario Inc. (“the Company”) has and will put in place to improve opportunities for people with disabilities.

## **Statement of Commitment**

2540095 Ontario Inc. (the “Company”) is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to the best of our ability and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Provincial Building Codes.

## **ACCESSIBLE CUSTOMER SERVICE POLICY**

This document is the policy and related procedures that will guide 2540095 Ontario Inc. to make all of the services it offers to the public and third parties accessible to individuals with disabilities.

This document contains the information that 2540095 Ontario Inc. must provide to meet its obligation under the Customer Service Standard. It is written with the intent to ensure all Service Providers ensure they operate under the principles of independence, dignity, integration and equality of opportunity.

## **Everyone Must Comply**

Everyone associated with 2540095 Ontario Inc., including but not limited to all employees, volunteers, owners, and third party individuals and entities who deal with the public on 2540095 Ontario Inc.’s behalf are bound by the policy and procedures in this document. These individuals and entities are hereafter referred to as Service Providers.

## **The Customer Service Policy**

The Customer Service Policy sets rules that will help all of 2540095 Ontario’s Service Providers understand the different needs that some clients with disabilities may have and their responsibility to find appropriate ways to help them access our services. 2540095 Ontario Inc. commits that its policy and procedures meet the duties and responsibilities required under Ontario Regulation 429/07 through the following practices:

## **Training**

2540095 Ontario Inc. will provide training on the Policy and the Accessibility Standards for Customer Service to all 2540095 Ontario Service Providers as soon as can be reasonably expected after their hiring or engagement. The primary reasons for this are to create awareness and to ensure compliance with the Policy and the Accessibility Standards for Customer Service. Training will be on an ongoing basis as changes occur to the Policy and/or to the Accessibility Standards for Customer Service.

2540095 Ontario Inc. will provide classroom based or online training. Human Resources will maintain records of the employees who have participated in the training and will review and revise the training from time to time to ensure it remains current with current best practices and with the Accessibility Standards for Customer Service.

The training includes but is not limited to:

- Why the Accessibility for Ontarians with Disabilities Act, 2005 was implemented;
- The requirements of the Accessibility Standards for Customer Service under the Act;
- How 2540095 Ontario Inc. policy and its procedures and practices are to direct the provision of services to persons with disabilities, as explained in the training;
- How to interact and communicate with persons with a range of disabilities;

- How to handle situations where a person with a disability has difficulty accessing 2540095 Ontario Inc's services;
- How to interact with persons with disabilities who use assistive devices, or require assistance from a support person or service animal; and;
- The equipment or devices available on 2540095 Ontario Inc. premises that may help serve persons with disabilities.

Human Resources will maintain written training records, that include the date training was provided, the type of training, and the name of trainees.

### **Service Animals and Support Persons**

A person with a disability is permitted to enter 2540095 Ontario Inc. premises with a service animal unless the animal is specifically excluded by law. In such rare cases that a service animal is excluded, the onus falls on 2540095 Ontario Inc. to provide other appropriate measures to enable the person with the disability to obtain, use or benefit from the services.

Section 4(9) of the Accessibility Standards on Customer Service states that an animal is a service animal if (1) it is readily apparent that the animal is being used for reasons related to a person's disability; or (2) if the person provides a letter from a doctor or nurse confirming that the animal is required for reasons relating to the disability.

Staff will receive training to identify support persons who may be a paid professional, volunteer, family member or friend who accompanies a person who requires help with communication, mobility, personal care, medical issues or to access goods and services. A disabled person's support person is to be permitted access to 2540095 Ontario Inc. facilities.

### **Notice of Temporary Disruptions**

2540095 Ontario Inc. will provide notice of temporary disruptions to service or facilities used by persons with disabilities including the reason(s) for the disruption. The notice shall be posted in a prominent location at the facility and on 2540095 Ontario Inc. web site when appropriate. When the disruption is planned, advanced notice will be given.

### **Emergencies**

Service Providers must be familiar with emergency procedures. They must know the best and most appropriate ways to assist customers or staff who need assistance during an emergency.

### **Feedback**

The best way to be certain of continuous improvement in the way service is provided is to let people know their comments/complaints are welcome. Notices posted in prominent locations inviting comments about service issues is particularly helpful when it comes to ensuring people with disabilities are not excluded from activities or services.

Service Providers will be instructed to note comments provided in person, in writing, online, by telephone, or any other means. A simple to use, accessible process for customers to provide feedback or complaints will be in place and communicated to the public.

Anyone with a complaint, question, concern or compliment about the Policy, Training Materials or Protocol may contact Human Resources, in writing or by telephone:

59 Hoyle Avenue, Suite 100  
Toronto, ON M4S 2X5  
P – 647 479 9989

2540095 Ontario Inc. will acknowledge your correspondence and will provide a written response, together with the findings, within thirty (30) business days of receiving your correspondence. This Protocol is available in an alternative format, upon request, to accommodate a person with disability.

## **PROCEDURES**

### **Procedures for Assistive Devices**

All appropriate measures must be taken to provide services to persons with disabilities who use assistive devices. Steps must be taken to ensure people have unencumbered access to the assistive devices they bring with them.

Service providers will not operate or otherwise interfere with a person's personal assistive device unless invited to do so by the person or his/her support person. As an example, do not move a wheelchair or cane without permission.

All Service Providers must be familiar with assistive devices that may be used by customers with disabilities while accessing services.

### **Procedures for Service Animals**

Service animals must be permitted to accompany a person with a disability anywhere a third party visitor is permitted including washrooms. Food preparation areas are an exception.

When it is not apparent that an animal is a service animal, a person with a disability may be asked to provide proof. Proof may be a letter from a doctor or nurse.

Service Providers are never to pet or distract a service animal. These actions may distract the animal's focus away from its owner and the owner's commands and cause a problem.

Subsection 4(2) of the customer service regulation states that "if a person with a disability is accompanied by a guide dog or other service animal, the provider of goods or services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her *unless the animal is otherwise excluded by law from the premises.*"

If there is a dispute over a service animal such as an allergic reaction by another service provider, client or customer, managers are responsible to find a solution that is acceptable to all parties. The best solution will be one that respects each individual's right to a safe, secure and accessible environment.

Service Providers should be able to provide water or direct the owner of a service animal to an outdoor area where the animal can relieve itself.

### **Procedures for Support Persons**

A person with a disability accompanied by a support person must be allowed to enter 2540095 Ontario Inc. premises with his or her support person in all areas where third parties are permitted and/or served. At no time will a person with a disability who is accompanied by a support person be prevented from accessing his or her support person.

### **Procedures for Temporary Service Disruptions**

Temporary service disruptions affecting 2540095 Ontario Inc. provision services will be communicated by the following:

- Physical Facility Service Interruptions to; washrooms, elevators, doors, entrances, corridors, stairwells, walkways, parking areas, and driveways, will be communicated by notices posted at the location of the service disruption (such as on the entrance to the parking lot or door of the elevator or washroom).
- Service stoppages or shortened hours caused by severe weather, disease outbreak and mechanical difficulties (e.g. a power outage) will be posted on 2540095 Ontario Inc. website and communicated by a general voice message at 2540095 Ontario Inc. regular phone number.
- Notices will give the reason for the disruption, the expected duration, if known, and describe possible alternatives
- Printed notices will be in plain language, in a plain font in large lettering (at least 20 point) and in black lettering on white paper.
- Notices will be posted in prominent locations, such as public entrances, information and reception desks, on the website and any other reasonable location that suits the circumstances.
- Information related to temporary disruption of local services (such as washrooms, elevators) will be available in person and by telephone.
- Reception staff will provide information about temporary service interruptions. If requested and if available, a staff member will guide the person to an alternate service, if available.

### **Notice of Availability and Format of Documents**

The Company provides documents related to the *Accessibility Standard for Customer Service* upon request.

### **Accessible Emergency Information**

The Company is committed to providing customers with publicly available emergency information in an accessible format, on request. We will also work with employees with disabilities to accommodate individualized emergency plans when necessary and on request and notification of a temporary or permanent disability.

### **IASR & ONTARIO HUMAN RIGHTS training**

As well as Customer Service training outlined in our Accessible Customer Service Policy, the Company will provide training to employees on the Human Rights Code as it relates to people with disabilities. Training will be included in orientation for all new employees and will continue to be available to employees wishing to refresh their knowledge.

### **Information And Communication**

#### **Feedback**

As well as our Customer Service Feedback process, the Company will receive feedback from employees via email, written letter, face to face conversation or telephone to Human Resources. Employees are reminded that Customers may submit feedback informally or formally in the same manner to ANY employee.

#### **Information**

The Company will make all publicly available information accessible upon request. The Company work with the person requesting such information to determine the best format to available suit their needs.

#### **Website**

The Company will work with Website Developers on any new or significantly refreshed Corporate websites to ensure that they conform to Ontario Law.

### **Employment Standard**

The Company is committed to fair and accessible employment practices. The Company will accommodate people with disabilities during the recruitment and assessment processes and when people are hired. If a job applicant requests disability related accommodation, we will consult with that applicant and make all possible adjustments to best suit their needs.

The Company will develop individual accommodation plans and return to work plans for employees that have been absent due to a disability, or require other disability related accommodations.

The Company will take into account accessibility needs of employees with disabilities when using performance management, career development or redeployment processes.

Upon learning of individual disability related accommodation requirements, the Company will consider such disability related accommodations required for our employees to improve their performance, learn new skills, take on more responsibilities and/or succeed in other positions in the organization in the event of a transfer. All documentation relating to performance management, career development or redeployment will be available in accessible format, including plain language, on request.

**For more information**

For more information, questions, suggestions or concerns on this accessibility plan, or to request accessible formats of this document or any publicly available documents, please contact Human Resources, in writing or by telephone:

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Toronto, ON M4S 2X5  
P – 647 479 9989