

SECTION 25. AODA INSTRUCTION

APPLICABLE TO	All locations and all staff	DATE OF ISSUE	January 1, 2025
REVISION NUMBER	2	REVISION DATE	January 1, 2025
APPROVED BY	Steve Jowett		

INTRODUCTION

STATEMENT OF ORGANIZATIONAL COMMITMENT

Our Company is committed to providing reasonable means of access in an efficient and compliant manner to persons with disabilities as defined under the Accessibility of Ontarians with Disabilities Act (AODA). Our standards of accessibility will pertain to access to goods, services and facilities under the control of our company.

Our company will ensure that our standards are facilitated in a manner that will respect the dignity and independence of persons with a recognized disability. It is the intent of our company to provide all person's equal opportunity to access our facilities and benefit from our company services.

ONTARIO HUMAN RIGHTS CODE

The Ontario Human Rights Code requires organizations to accommodate people with disabilities to the point of undue hardship as defined in the Ontario Human Rights Code (see section 1 of the Integrated Accessibility Standards Regulation for more details). The Integrated Accessibility Standards Regulation does not replace or affect legal rights or obligations that arise under the Ontario Human Rights Code and other laws relating to the accommodation of people with disabilities. This means that the Ontario Human Rights Code or other applicable legislation may require additional accommodation measures that go beyond, or are different from, the standards established by the regulations of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

ONTARIO'S BUILDING CODE

Barrier-free design requirements within buildings have been regulated through Ontario's Building Code since 1975. Ontario's Building Code regulates accessibility features inside buildings, such as accessible washrooms, as well as walkways or ramps that connect to building entranceways. The Design of Public Spaces Standard primarily regulates outdoor spaces, such as pedestrian crossings and trails, but also regulates indoor elements not included in the Building Code, such as service counters and fixed queuing guides.

The Ministry of Municipal Affairs and Housing has worked alongside the Ministry of Economic Development, Trade and Employment to develop updated requirements for accessibility in both public spaces and in buildings. Updated Building Code requirements for accessibility in buildings come into effect on January 1, 2015.

PURPOSE

The purpose of this policy is to acknowledge our organizations commitment to provide reasonable standards of service to all persons in accordance with the "Accessibility for Ontarians with Disabilities Act, 429/07" (referred to as AODA).

SCOPE

Our policies and programs apply to all Managers, Supervisors and Employees. Agents, subcontractors or service providers to, or under contract with, our firm are required to be aware of and adhere to our OH&S policies, procedures and programs in use. Copies of this manual and program are available for review at our head office, job site safety boxes and digitally in SiteDocs.

POLICY ON INTEGRATED ACCESSIBILITY STANDARDS

Our policy is intended to reflect all pertinent requirements under Integrated Accessibility Standards Regulations of Ontario (IASR).

These standards will include, but may not be limited to;

- establishing, implementing, maintaining, documenting and posting a multi-year accessibility plan, showing how the organization intends to meet its accessibility requirements
- providing training on the Ontario Human Rights Code as it relates to people with disabilities and accessibility requirements under the AODA, including those for accessible customer service, information and communications, employment practices, transportation and the design of public spaces.
- keeping a record of training, as it is completed, to ensure all staff have been trained and are re-trained if there are changes to our accessibility policies.
- providing, where needs dictate, the development and documentation of individual accommodation plans for employees who have a disability.
- providing, where needs dictate, individualized workplace emergency response information to employees who have a disability.
- taking into account the accessibility needs of its employees with disabilities when:
 - undertaking performance management and career development initiatives
 - redeploying employees
- placing a return-to-work process for employees who have been absent from work due to a disability and require disability related accommodations in order to return to work
- making new or redeveloped public spaces accessible as required under the Accessibility Standard for the Design of Public Spaces.
- meeting the needs of people with disabilities in a timely manner.
- providing access to its offices, goods and/or services in a way that respects the dignity and independence of people with disabilities
- upon request, providing its publicly available information, including emergency and public safety information, in a way that is accessible to a person with a disability
- working towards making its website accessible to people with disabilities
- upon request, providing its publicly available information pertaining to the IASR.

Our policies will be available in written format and will be available to the public as necessary upon request.

See Appendix “A” for sample template

MULTI-YEAR ACCESSIBILITY PLAN

We recognize that allowing barrier free access and accommodating the needs of our workers and clients is an ongoing activity. Where necessary, we will maintain a multi-year accessibility plan. The plan will be reviewed by Senior Management and updated at least once every five years. Current plans and initiatives can be made available to the public and provide it in an accessible format when requested.

See Appendix “B” for sample template

INFORMATION AND COMMUNICATIONS

When providing information to, or communicating with, a person with a disability, we will provide, upon request, the information and communication in an accessible format or with a communication support. We will work in consultation with the person with the disability to provide them with the information in a manner that takes into account the person's disability.

GENERAL PRINCIPALS

The development of this program will provide benefits to both our employees with disabilities and visitors by allowing access to our property without barriers. This will ensure legislative compliance and clarify our company standards.

The fundamental principles of this standard are to ensure that the dignity and independence of all persons with a disability is respected at all times.

The standard will also ensure that all persons requiring service from our organization receive equal treatment as required under the Human Rights Code.

PROGRAM ELEMENTS

As a minimum, our standards will consist of elements as required under the AODA that will include, but not be limited to our organization's standards;

- Establishment of policies, practices and procedures
- Access to Building and Services
- Assistive Devices and Technologies
- Use of Service Animals and Support Persons
- Notice of Temporary Disruptions
- Training for Company Personnel
- Provisions for Communication and Feedback
- Notice of Availability and Format of Documents Related to AODA

PROGRAM STANDARDS

ACCESS TO BUILDING AND SERVICES

Our organization will ensure that proper building access and egress is maintained at all times.

Where necessary, and in accordance with our business practice, our staff will be prepared to accommodate those with disabilities by providing at-home consultations as required.

It is the policy of our organization to review any issues, concerns or recommendations made by the general public or our clients regarding the functioning or maintenance of these facilities.

ASSISTIVE DEVICES AND TECHNOLOGIES

Our organization permits the use of assistive devices and technologies designed to aid persons with disabilities while in public areas of our properties. Any assistive technologies required by any persons with a disability will be permitted without restrictions for use on our properties. Policy and procedural changes may be required to ensure the health and safety of all persons is protected at all times. Assistive devices in consideration under this program will include:

- Walking Canes
- Crutches
- Assistive Walking Devices (Walkers)
- Mobile Scooter (for disabled persons only)
- Vehicles equipped with assistive mechanisms (Wheelchair lift etc.)
- Electronic Communication devices

USE OF SERVICE ANIMALS AND SUPPORT PERSONS

Where not excluded by law, our organization fully supports the use of “guide dogs” as defined under Section 1 of the Ontario Blind Person’s Rights Act in all public areas of our properties.

Use of other “service animals” on our properties will be only be permitted for a disabled person, and only if the animal is a required benefit to that disabled person.

Where necessary our organization will reserve the right to request a note from either a licensed doctor or medical specialist to confirm the “service animal” is for reasons relating to the persons disability.

The care, use and safety of any animal on our property are the responsibility of the owner of the animal.

Our company will assume the responsibility within reasonable limitations to clean any areas left soiled by guide dogs or other service animals in public areas of our properties.

Any issues or conflicts regarding the use of guide dogs or service animals must be immediately reported to the Senior Manager. Circumstances may include but are not limited to;

- Any incident involving violence directed to, or injuries received from a guide dog or service animal.
- Issues concerning fears of, or allergies to, animals.
- Reasonable protests involving animals being present inside the building. (Health standards)
- Support persons assisting disabled individuals providing services to our facilities are welcomed. Support persons and disabled persons requiring access to authorized areas of our properties may only do so with permission from senior management and only while accompanied by approved company personnel as required. Support persons assisting contracted services may be required to accept, or be included in the same service agreements as disabled persons.

NOTICE OF TEMPORARY DISRUPTIONS

In the event that our public facilities experience temporary disruptions that may affect access or services for the disabled, reasonable measures will be taken to ensure prompt communications and corrective action as required.

It will be the responsibility of Management to ensure that information regarding any disruption is provided to staff and visitors as required. Notifications will be provided within a reasonable timeframe and must contain information including, but not limited to:

- The time, date and location of the disruption,
- The reason for the disruption of service,
- The anticipated duration of the disruption of service,
- Descriptions of temporary or alternative alternatives (where necessary or available),
- Contact information for those involved in the circumstances.

In accordance with AODA, notifications of the disruption must be posted in conspicuous areas on each floor of the buildings or properties as required. Notifications will be limited to public areas of the buildings and properties only. Senior Management will be responsible for posting notifications as required.

ACCESSIBLE WEBSITE

Our company currently maintains a website to provide information to the general public. It is the intent of our company to provide ease of access and use to all persons as reasonably possible. In accordance to the IASR, our websites will comply as required with the Level A standards as determined by the World Wide Web Consortium Web Content Accessibility Guidelines. Where necessary we will review and acknowledge all other required updates or upgrades as required under this standard. As our website is developed and maintained through a third-party organization, we may be limited to the scheduling and timelines as is reasonably required by our provider(s).

EMPLOYMENT

Our employment practices will include notification of the availability of accommodation for applicants with disabilities, as well as supports for staff with disabilities. Where employee needs dictate, we will provide individualized workplace emergency response information to employees who have a disability. Our performance management and career development processes will take into account the accessibility needs of its employees with disabilities.

DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS

Our process for the development of documented individual accommodation plans can include;

- How we include the employee in the development of the plan,
- How we consider the employee needs on an individual basis,
- How we proceed in getting a medical (or expert's) opinion on the accommodation,
- How other representatives or agents may or may not be involved,
- How the employee's personal information will be protected,
- How often the plan will be reviewed and the process involved,
- How to provide the plan in a format respecting the individual's disability needs.

WORKPLACE REINTEGRATION PROGRAM

As part of our Occupational Health and Safety Management program, any employee who is required to participate in a Workplace Reintegration Program, as a result of a work-related incident as prescribed under the Workplace Safety and Insurance Act, will do so in accordance with our existing company / WSIB standards. These standards include, but are not limited to;

- Notification to the WSIB
- Submission of all required documentation and correspondence
- Communication with injured worker and their physicians
- Establishing a work reintegration program approved by injured workers physician
- Maintaining communication between all parties involved with the return-to-work program
- Monitoring the injured workers rehabilitation progress until normal duty can be achieved.

TRAINING FOR COMPANY PERSONNEL

Elements of this AODA compliant program will be included in the Corporate Safety Program. The company shall provide training to all employees in the organization who are required to interact with the general

public.

Training will include:

- An overview of the Human Rights Code and Building Code impacts to AODA
- Review of the Purpose of the AODA
- A review of the company accessibility standards
- Interacting and Assisting Persons with various Disabilities
- Use of Assistive Devices, Support Animal and Support Persons
- Disability Access Problem Solving

A review of the AODA training requirements and refresher training will be conducted on a yearly basis to review current policies, procedures and practices as required. Records of training will be kept on file for each employee.

PROVISIONS FOR COMMUNICATION AND FEEDBACK

Our company will accept feedback pertaining to the quality of services to the disabled in our properties. Communication including contact phone number, mailing address and fax number for our company will be made available and posted in a conspicuous area. Senior Management will review and respond to feedback within a reasonable time frame as required.

NOTICE OF AVAILABILITY AND FORMAT OF DOCUMENTS RELATED TO AODA

All documentation as required under the AODA, including all policies and procedures as required by the Freedom of Information and Protection Privacy Act will be provided upon request. When providing documentation to the disabled, our company will make all reasonable efforts to ensure the person's disability is taken into consideration when providing the documentation.

APPENDIX “A” TEMPLATE – MULTI-YEAR ACCESSIBILITY PLAN

IASR REQUIREMENT	TARGET DATE	STRATEGY	STAFF	COMMENTS
<p><i>E.g.</i></p> <p><i>Where provided, make emergency and public safety information accessible upon request</i></p>	<p>January 1, 2030</p>	<p>Identify one or more actions that your organization will take to prepare and comply with the corresponding requirement.</p> <p>Examples:</p> <ul style="list-style-type: none"> o Review compliance assistance materials o Review current information and communication formats o Research vendors and options for providing accessible information o Establish policy to provide information in an accessible format on request and communicate to all staff 	<p>Identify the department or individual responsible for each action item</p>	<p>Use this field to identify any possible challenges and/or considerations such as:</p> <ul style="list-style-type: none"> o Resources required for implementation o Timelines for implementation o Etc.

APPENDIX “B” TEMPLATE – MULTI YEAR ACCESSIBILITY PLAN WORKSHEET

ACCESSIBLE INFORMATION & COMMUNICATION REQUIREMENT	AODA TARGET DATE	STRATEGY	COMPANY TARGET	STAFF RESPONSIBILITY
<p><i>Emergency & Public Safety Information</i></p>	<p>January 1, 2030</p>	<p>Convert existing emergency & public safety information into a format that will allow it to be made available in accessible formats, upon request.</p> <p>Develop procedure for new/additional information to be available to persons with disabilities at same time as others</p>	<p>January 1, 2030</p>	<p>Identify the department or individual responsible for each action item</p>