



AODA – Provision of Goods and Services to People with Disabilities Policy

Please note:

- *Under the Accessibility for Ontarians with Disabilities Act, 2005 all public and private sector organizations must meet the requirements of accessibility standards established by the regulation.*
- *Where this policy varies from the Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act (AODA), the AODA Standard shall apply.*
- *This policy may require revision as other standards are introduced under the AODA.*
- *This policy establishes the Integrated Accessibility Standards in the areas of, Employment, Information and Communications, Transportation, and Design of Public Spaces in accordance with Ontario Regulation 191/11. The Customer Service Standard, part of the Integrated Accessibility Standards Regulation effective July 1, 2016, forms a separate policy.*

AODA Policy Statement

Grakon Hamsar Holdings Ltd. (“Hamsar”) is committed to the provision of goods and services to people with disabilities in a manner consistent with the principles of dignity, independence, integration, and equal opportunity.

Furthermore, such goods and services will be provided in accordance with the spirit and intent of all applicable legislation including the *Accessibility for Ontarians with Disability Act (AODA)*, the *Integrated Accessibility Standards Regulation (IASR)* which includes standards for Customer Service, Information and Communications, Employment, Transportation, and Built Environment, the *Ontario Human Rights Code (OHRC)*, the *Occupational Health and Safety Act*, and the *Ontario Building Code Act*.

IASR Policy Statement

Grakon Hamsar Holdings Ltd. (Hamsar) is committed to providing persons with disabilities the same opportunity to access our resources and services, in a manner consistent with the principles of dignity, independence, integration, and equal opportunity.

Furthermore, Hamsar shall use every effort to ensure that we meet the needs of persons with disabilities, in a timely manner, through the implementation of this policy in accordance with the spirit and intent of all applicable legislation including the AODA, the *Ontario Human Rights Code*, and the *Occupational Health and Safety Act*.



Definitions

For the purposes of these policies, the following terms are defined:

Disability:

The term “disability” as defined under the AODA and the OHRC includes:

- 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 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*.

Service Animal:

An animal is a service animal for a person with a disability:

- a. if it is readily apparent that the animal is used by the person for reasons relating to their disability; or
- b. if the person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

“Service animal” also includes a guide dog as defined under the *Blind Persons’ Rights Act* section 1.

Supervisor:

A person who has charge of a workplace or authority over a worker. Generally this would include those with a position title such as Director, Manager or Supervisor, as well as any other management type position, or those in a temporary supervisory position.



Accessible Formats:

Refers to materials that have been converted to accessible formats, which include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Accommodation:

The special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons with disabilities. Accommodation shall vary depending on the person's specific accessibility needs.

Communications:

The interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Communication Supports:

Methods and aids that facilitate effective communications with persons with disabilities that include, but is not limited to, captioning, alternative and augmentative communication supports, plain language, and sign language.

Information:

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

Redeployment:

Means the reassignment of workers to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Unconvertible:

- a. If it is not technically feasible to convert the information or communications;
- b. The technology to convert the information or communication is not readily available.

Support Person:

A support person is a person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to



goods or services. The support person could be a paid personal support worker, a volunteer, a friend or a family member. They do not necessarily need to have special training or qualifications.

Worker:

Refers to any person regarding whom Hamsar pays wages or a salary, has control over their assigned work and has a right to control the details of their work.

This includes, but is not limited to:

- a. fulltime workers
- b. part-time workers
- c. seasonal workers
- d. contract workers

Operating Principles

Accessible Communication

Hamsar and its employees (“workers”) will communicate with people with disabilities in ways that take into account each person’s particular disability.

Service Animals and Support Persons

Unless otherwise prohibited by law, persons with disabilities will be permitted to be accompanied by a service animal or support person:

- a. where services are provided at premises owned or operated by Hamsar;
- b. where the public or third parties normally have access to such premises.
- c. where a support person accompanying a person with a disability, the admission fee or fare, if any, must be waived.

Assistive Devices

Hamsar is committed to serving people with disabilities who use assistive devices. We will endeavor to become familiar with the various assistive devices used by people with disabilities and will be flexible in facilitating their use by people with disabilities to access our goods and services.



Disruption in Service

Hamsar will post timely public notice of a current or anticipated disruption in any facilities or services we provide to enable people with disabilities to access our services. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Multi-Year Accessibility Plan

Hamsar shall create a multi-year Accessibility Plan outlining a phased-in approach to prevent and remove barriers and address the current and future requirements of the AODA. The plan shall be reviewed and updated at least every five years or as required.

Training

Hamsar will provide training to:

- a. All workers and volunteers, regardless of whether or not they have direct contact with the public on behalf of Hamsar.

This training will be provided within four (4) weeks of when the individual commences performing duties for Hamsar. Additional training will be provided within four (4) weeks of any revisions made to this policy and/or related procedures and practices.

Such training will include the following:

- a. A review of the purposes of the AODA and the requirements of its *Integrated Accessibility Standards Regulation (IASR)* - Customer Service Standard.
- b. How to interact and communicate with persons with various types of disability.
- c. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
- d. How to use equipment or devices available on Hamsar's premises that may help with the provision of goods or services to a person with a disability.
- e. What to do if a person with a particular type of disability is having difficulty accessing the goods or services provided by Hamsar.

If it is determined that it is not technically feasible to convert the information or communication, or the technology to convert the information or communication is not readily available the person requesting the information shall be provided with:

- an explanation as to why the information or communication is not convertible;



- a summary of the unconvertible information or communication.

Feedback Process

Hamsar will establish a process for receiving and responding to feedback from anyone about the manner in which it provides goods or services to persons with disabilities. Information about this process will be made accessible and Hamsar will provide or arrange accessible formats and communication supports, on request.

The feedback process will permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise.

The feedback process will specify the actions to be taken by Hamsar in the event that a complaint is received. A response will be provided to the person making the complaint within seven (7) working days.

Accessible Formats and Communication Supports

Hamsar shall provide or arrange for accessible formats and communication supports for persons with disabilities:

- Upon request, and in a timely manner that takes into account the person's accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to another person; and
- In consultation with the person making the request determine the suitability of an accessible format or with appropriate communication supports.

Education, Training and Materials

Hamsar shall provide access to or prepare for the provision of access to accessible materials where they exist, make information about the availability of accessible materials publicly available, and provide the information in an accessible format or with appropriate communication supports, upon request.

Website Accessibility

Hamsar shall make their company Internet and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2014, any new web content shall conform to WCAG 2.0 Level A. By January 1, 2021 all website and web content shall conform to WCAG 2.0 Level AA.



EMPLOYMENT STANDARDS

The Employment Standards builds upon the present requirements under the *Human Rights Code* in relation to whereby accommodate persons with disabilities through the job application process and the employment relationship. It applies in respect to workers and does not apply to volunteers and other non-paid individuals.

Recruitment and Selection

Hamsar shall notify internal and external job applicants about the availability of accommodations upon request for applicants with disabilities. This may take the form of a notice posted to the company website or a statement on a job posting for which “accommodation for applicants with disabilities is available upon request.” In addition, job applicants who have been selected to participate in an assessment or selection process shall be notified that accommodations are available. The related materials or processes required specific to the job applicant’s disability shall be discussed in consultation with the applicant.

Worker Notification

Hamsar shall inform workers of policies and procedures including those on the provision of job accommodation that take into account a worker’s accessibility needs. This information shall be provided to new workers as soon as practical after they commences performing their duties with Hamsar. Once the applicable support is identified, Hamsar shall determine how best to accommodate the worker in consultation with the reporting supervisor, human resources specialist and the worker.

Accessible Formats and Communication Supports for Workers

In addition, and where a worker with a disability requests it, Hamsar shall consult with the worker to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the job tasks;
- Information that is generally available to workers in the workplace;
- Consult with the worker making the request in determining the suitability of an accessible format or communication support.



Individual Accommodation Plan

Hamsar shall develop, maintain and document an individual accommodation plan for workers with disabilities to meet requirements under the Employment Standards. Information regarding accessible formats and communication supports shall be covered in individual accommodation plans.

Return to Work Process

Hamsar shall maintain a return to work process for its workers who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The work process shall take into account individualized accommodation plans suitable for the worker. The HR Manager manages this with the employee and provides appropriate documentation to be completed.

Performance Management, Career Development, Advancement, and Redeployment

Hamsar shall examine the accessibility needs of workers with disabilities when handling performance management, providing career development and advancement to workers, and if redeploying workers to other locations or workgroups.

Workplace Emergency Response

Where the worker with a disability requires assistance, Hamsar shall, in consultation with the worker, provide an assigned support person(s) to assist during emergency situations that require evacuation of the premises. The individualized workplace emergency plan or process shall be shared with the support person(s), only with full agreement by the worker ensuring their privacy at all times. Hamsar shall review the individual workplace emergency information when or if the worker moves to a different location or workgroup, or there is a change to their disability, with the reporting supervisor, human resources specialist and the worker.

In addition, a general, emergency evacuation process shall be in place for any facility that may have visitors with disabilities that require further assistance. This process shall be communicated to all workers.

TRANSPORTATION STANDARDS

The Transportation Standards makes it easier for people to travel on specialized and public transportation and in taxicabs in Ontario, including persons with disabilities, older Canadians, and families with children in strollers.



Hamsar is not a provider of specialized or public transit and does not license taxicabs; therefore the Transportation Standards requirements do not apply to the company.

DESIGN OF PUBLIC SPACES STANDARDS

The standard focuses on removing barriers in the areas of buildings and public spaces. The requirements apply when building new or making planned significant alterations to existing public spaces. Hamsar will include the accessibility requirements right at the beginning, in the earliest stages of planning and design, when applicable.

Policy Administrative Controls

Responsibilities

Hamsar is responsible for reviewing this policy every three (3) years and implementing recommended amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.

Management personnel will ensure that they and their workers under their supervision are familiar with this policy.

Monitoring and Contraventions

Management personnel will monitor current practices to ensure compliance. Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

Please note

This policy is subject to amendment and/or revocation at the company's sole discretion, without prior notice to workers.



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