

Accessibility for Ontarians with Disabilities Act, 2005 (AODA) Policy

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Approved By: Georgia Cunningham Bolger, President & CEO

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Procure

Purpose:

The Accessibility for Ontarians with Disabilities Act (AODA) was developed by our provincial government to benefit everyone by ensuring that Ontario workplaces achieve accessibility with respect to goods, services, facilities, accommodation, employment, buildings and structures. The Act reflects the goal to improve accessibility across this province.

Legislation relevant to this policy:

- Accessibility for Ontarians with Disabilities Act, 2005 – O.Reg. 429/07
- Ontario Regulation 191/11
- Ontario Human Rights Code

Scope: This policy applies to all SGC employees, and it extends to the treatment of co-workers, subcontractors, vendors, suppliers, clients and visitors.

Definitions:

AODA: Accessibility for Ontarians with Disabilities Act

Disability: A disability is a physical or mental condition that limits a person's movements, senses, or activities.

Accessibility: Means access – the ability for everyone, regardless of special needs, to access, use and benefit from everything within their environment. The degree to which a product or service is available to as many people as possible.

POLICY – Statement of Organizational Commitment

S.G. Cunningham (SGC) is committed to providing equal treatment, equal access and equal participation for people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

SGC is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.



Our company understands that obligations under the AODA, 2005 and its accessibility standards do not substitute or limit our obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

SGC is committed to excellence in serving and providing goods, services or facilities to all customers, including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities.

As a construction company, we must exercise due diligence when a person with a disability works on or visits one of our construction sites. We must take every precaution to protect the individual's health and safety while maintaining the principles of dignity, independence, equal opportunity, and integration. We must approach each situation based on its own unique circumstances.

Guiding Principles:

When providing service to persons with disabilities, the following principles should be upheld:

Dignity – treating people who have a disability as valued clients or co-workers and as deserving of respect as anyone else.

Independence – freedom from control or the influence of others – the ability to make your own choices.

Equal opportunity – having the same chances, options, benefits and outcome as everyone else.

Integration – enabling people with disabilities to benefit from services in the same/similar way to others.

Background

Two sets of Standards are covered by the AODA: Accessibility Standards for Customer Service (ACS) and Integrated Accessibility Standards Regulation (IASR).

AODA pertains to employers who:

- Provide goods and services either directly to the public or to other businesses or organizations, *and*
- Have one or more employees in Ontario

Customer Service

To provide accessible customer service, SGC must

- train staff on this topic and
- ensure that our employees uphold the following when Clients who have a disability want to access our services:
 - Consider a person's disability when communicating with them
 - Allow assistive devices* in our office: wheelchairs, walkers, oxygen tanks, etc.
 - Allow service animals* in our office: assess risks and controls on site

- Welcome support persons*
- Inform customers when accessible services aren't available
- Invites customers to provide feedback

**Note: Assistive devices, service animals and support persons may not be able to access our construction site(s). A hazard assessment must be conducted prior to the person with a disability entering the site. We must determine hazards, risks and controls and develop a personalized accommodation plan based on the individual case. In some instances, site access may not be possible.*

Offering accessible customer service is not only about the structure of the physical premises – such as changing doors or adding elevators or ramps. It's about understanding that customers with disabilities may have different needs and helping them can be as easy as asking one simple question: *How can I help?*

Customer Service Standards for Small Businesses (under 50 employees):

The following requirements of the Customer Service Standard apply to S.G. Cunningham:

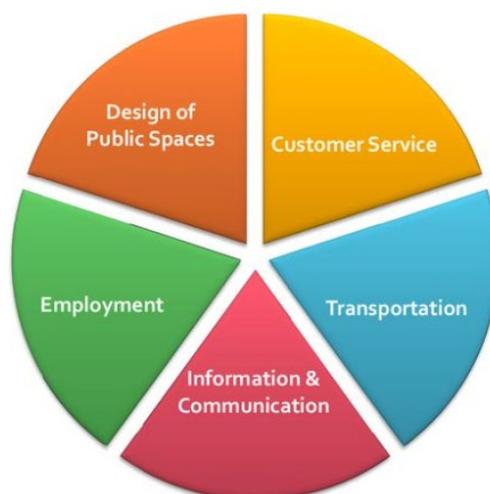
1. Establish a policy on providing goods or services to people with disabilities.
2. Use reasonable efforts to ensure that your policies and procedures are consistent with the core principles of independence, dignity, integration and equality of opportunity.
3. Communicate with a person with a disability in a manner that takes into account their disability.
4. Train staff and those involved in developing policies and procedures on the provision of services and topics outlined in the Customer Service Standard.
5. Comply with government reporting requirements/deadlines.

Integrated Accessibility Standards

This regulation sets requirements for each of the standards, as well as general requirements that apply to all, such as:

- Developing accessibility policies
- Training employees
- Considering accessibility when purchasing goods or services

Accessibility standards apply to the following five important areas



Training:

We will train all employees (including those developing/updating SGC's policies and procedures) on providing accessible customer service, the Ontario Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code as it pertains to person with disabilities.

Training will take place:

- As soon as possible when a new employee joins the company – during HR Orientation
- When a change is made to this AODA policy
- Every five years we will complete refresher training

Training will be provided through:

- The AccessForward online training program : <https://accessforward.ca>
- HR / Safety Talks

Training will cover:

- The purpose of AODA, 2005
- The requirements of AODA's Customer Service Standards
- Our policy in relation to the Customer Service Standards
- 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 a support person
- What to do if a person with a disability has trouble accessing our services or facilities:
 - In this case, a personal plan will be developed based on the individual's unique situation. Each person with a disability may have different abilities and special needs, and all capabilities and limitations must be taken into consideration.

SGC maintains records of our AODA training, including the names of employees trained and the dates they were trained.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing our services and facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern (or it may not be permitted for other reasons) other measures will be used to ensure the person with a disability can access our services or facilities.

Other measures: If it is unsafe for a person with an assistive device, such as a wheelchair, walker, or white cane to enter a construction site, we can hold meetings off-site, in-person or via Microsoft Teams. Site tours can be provided using Teams.

Communication

Our team will communicate with people with disabilities in ways that take into account their disability. This may include the following:

- Speaking to the person with the disability – not speaking *only* to their support person
- Using plain language when speaking or writing
- Communicating via phone or a Teams meeting if that is their preference
- Reading written information directly to the person
- Providing them with large-print reading materials
- Providing handwritten notes instead of spoken word
- Providing an electronic document formatted to be accessible for use with a screen reader
- Other means of communication that the person or their support person may request

Service Animals:

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public (i.e., our office). Our office is a pet-friendly office and we do not need to request formal documentation from any client who might bring a service animal to a meeting. However, the service animal must be kept in control at all times.

Should an employee require a service animal on a continual day-to-day basis, our HR Department may request documentation (a letter or form) from a regulated health professional that confirms the service animal is required for an ongoing disability.

A regulated health professional is defined as a member of one of the following Ontario colleges:

- College of Audiologists and Speech-Language Pathologists
- College of Chiropractors
- College of Nurses
- College of Occupational Therapists
- College of Optometrists
- College of Physicians and Surgeons
- College of Physiotherapists
- College of Psychologists
- College of Registered Psychotherapists and Registered Mental Health Therapists

Service animals may be prohibited from the following areas:

- A Construction Site for which a Hazard Assessment has indicated that it is unsafe to bring a service animal onto the site

Support Persons

A person with a disability will be allowed to have a support person accompany them in our office.

A support person may be prohibited from a construction site for which a Hazard Assessment has indicated that it is unsafe to bring a person with a disability and their support person onto the site.



Should a Hazard Assessment indicate that it is **safe** for a person with a disability to visit a site, SGC may require the individual to be accompanied by a support person for the health and safety of the individual as well as others on the premises. Before making this decision, SGC will:

- Consult with the individual to understand their needs
- Consider health or safety reasons based on available evidence

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for clients with disabilities, SGC will notify clients promptly.

We will notify clients in one or more of the following ways (depending on the nature of the disruption):

- A telephone call to the client
- An email to the client
- A face-to-face visit to the client to inform them of the disruption

A notice of disruption of services will be made publicly available in the following ways:

- A notice on the front door of our office
- A message broadcast via social media (Instagram, Facebook)
- A notice on our website

Emergency Response Plans (ERPs)

Any employee with a disability will follow SGC's normal Emergency Response Plan procedures. In addition:

- Should the individual require the assistance of a co-worker to evacuate the building, a co-worker will be assigned to that individual.
- The Safety Officer will provide individualized emergency response information
- The Safety Officer and the person with disability must review the emergency response information, should:
 - The employee change work locations
 - The employee's overall accommodation needs change
 - Whenever the company's ERPs are reviewed
- The Joint Health & Safety Committee (JHSC) will provide support to the Safety Officer in evaluating the ERP

Building Accessibility

Note: Making buildings accessible is covered under the Ontario Building Code (not AODA).

General Procedures when Working with a Person with a Disability

- Treat anyone with a disability with the same respect and courtesy that you would offer to everyone else.
- Treat and speak to adults with disabilities as adults.
- Speak directly to the person with a disability not to their support person.
- Don't shout; speak clearly and distinctly, and at a moderate pace.

- Offer assistance if it seems appropriate, but wait until the offer is accepted before you help. If you are helping and aren't sure what to do, ask.
- Let the person make their own decisions regarding what they can or cannot do.
- Do not make assumptions.
- Do not pet, feed or distract a guide dog or service animal from doing its job.
- Effective ways of providing information for one person with a disability may not be appropriate for another.
- Different people with the same type of disability may communicate in different ways because of different skills or resources.
- Where possible, it is helpful to ask the person directly how to communicate with them.
- Be prepared to read aloud any written information not made available in alternative formats. Read in a normal speaking voice, at a normal pace, without skipping any information.

Feedback Process:

SGC welcomes feedback on how we provide accessible customer service. Client feedback will help us identify barriers and respond to concerns. Feedback may be provided in the following ways:

1. Call our office to speak to the HR Manager: 519-886-2730, Ext. 118
2. Call our office and request a Teams meeting with our HR Manager
3. Email our office: "info@sgcunningham.com"
4. Write to our office at the following address:
HR Manager
S.G. Cunningham Limited
35 Weber St. N., Waterloo, ON N2J 3G5

All feedback, including complaints, will be handled in the following manner:

- HR Manager will:
 - Review the feedback
 - Involve Top Management as required
 - Decide upon the appropriate response
 - Maintain the confidentiality of the person providing feedback
 - Will respond to the person providing feedback in an appropriate format
 - Inform the JHSC that feedback has been provided
 - JHSC will add as Agenda item for next scheduled meeting
- JHSC will monitor feedback for patterns/trends and track responses
- JHSC Minutes to reflect any amendments made to Policies and Procedures

Customers can expect to hear back from our HR Manager within three business days.

Information and Communications

We have a process for receiving and responding to feedback and this process is accessible to persons with disabilities upon request.



We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services in a timely manner, in accessible formats or with communications supports. There is no cost for this information to persons with disabilities.

We will consult with the person requesting information to determine the suitability of an accessible format or communication support. If SGC determines that information or communications are unconvertible, we will provide the requestor with:

- An explanation as to why the information or communications are unconvertible, and
- A summary of the unconvertible information or communications.

We will notify the public about the availability of accessible formats by posting this policy on our website.

Notice of Availability of Documents

SGC provides our AODA policy to the public on our website. The public may request other documents or information by following the Feedback Process outlined on page 7 of this policy. Upon request, we will provide documents in an accessible format or with communication support. Accessible documents will be provided in a timely manner at no cost.

Employment

S.G. Cunningham provides equal opportunity to all job applicants. We notify job applicants that:

- Accommodations can be made during recruitment and hiring, upon request
- We will consult with the applicant and provide or arrange suitable accommodation as required

We notify successful applicants about this policy via our Offer of Employment Letter and our proposed Employment Agreement when we offer employment.

We notify staff that supports are available for those with disabilities through the proposed Employment Agreement they receive when offered a position with SGC. We provide updated information to employees whenever there is a change to existing policies regarding job accommodation for employees with accessibility needs due to a disability.

We will consult with employees when arranging accommodation for their accessibility needs, including the suitability of accessible format or communication supports specifically for:

- Information that is needed for the person to perform their job duties, and
- Information that is generally available to employees in the workplace

As soon as we are aware of the need for accommodation due to an employee's disability, we will provide customized information to help the employee during an emergency. With the employee's consent, we will provide information to a designated person who will assist the employee during an emergency. An individualized emergency plan will be reviewed, if necessary:

- When the employee moves to a different job or location within the company
- When the employee's overall accommodations needs or plans are reviewed, or
- When SGC reviews its general emergency response policies

We have a written process to develop individual accommodation plans for employees (detailed in our Return to Work Policy).

Changes to Existing Policies

Any SGC policies that are found to not respect the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed. This document is publicly available. Accessible formats are available upon request.

Roles & Responsibilities:

Top Management	<ul style="list-style-type: none"> • Ensure this policy and related procedures are created and implemented • Assign one person to oversee the AODA program
HR Manager	<ul style="list-style-type: none"> • Take a lead role in the AODA program • Arrange training and keep proof of training records on file • Update the Training Matrix as required
Safety Officer	<ul style="list-style-type: none"> • Develop and communicate Emergency Response Plan information to the person with the disability • Ensure co-workers understand their role in helping the person with the disability in the event of an emergency
All Employees	<ul style="list-style-type: none"> • Should you witness a breach of this policy, please advise the HR Manager immediately

Communication: This policy will be communicated through:

- An email to each workplace party
- Posting on bulletin board in Communications Room
- A copy will be available to each new employee on their first day through Procure

Evaluation:

- Via client, employee and public feedback

Forms Applicable to this Policy: None

Reference Material:

- AODA website
- <https://accessforward.ca>