

**Accessibility for Ontarians with Disabilities**

**Policies & Procedures**

**2013-2017**



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**What is the Accessibility for Ontarians with Disabilities Act?**



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The Accessibility for Ontarians with Disabilities Act states:

Recognizing the history of discrimination against persons with disabilities in Ontario, the purpose of this Act is to benefit all Ontarians by:

Developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025; and

Provide for the involvement of persons with disabilities, of the Government of Ontario and of representative of industries and of various sectors of the economy in the development of the accessibility standards.

Under the umbrella of this Act, the province is enacting regulations known as accessibility standards. Standards are developed to reach goals in stages so that Ontario is accessible by the year 2025. The standards focus on five areas to identify, remove and prevent new barriers for people with disabilities so they can participate equally in society. The five identified areas are customer service, information and communications, built environment, employment and transportation.

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The following information in this package will outline 2415228 Ontario Inc.'s statement of commitment to accessibility standards, the accessibility policy, a multi-year plan and useful aids to help ensure compliance.



II

**Statement of Organizational Commitment**



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## **Policy**

Under the AODA, Ontario Regulation 191/11, entitled, integrated Accessibility standards Regulation, [the “Integrated Regulation”] came into force July 1 2011. The regulation establishes accessibility standards for information and communications, employment and transportation. 2415228 Ontario Inc. is included in the regulation’s definition of an “obligated organization” and must comply with the phased-in requirements of the regulation beginning January 1, 2014

2415228 Ontario Inc. is committed to working towards being compliant with all the standards under the Accessibility for Ontarians with Disabilities Act (AODA) as they are introduced and become law.

2415228 Ontario Inc. recognizes the history of discrimination against persons with disabilities in Ontario and the fundamental importance of developing, implementing and enforcing standards in a timely manner in order to achieve accessibility for Ontarians with disabilities.

2415228 Ontario Inc. is committed to the principles of independence, dignity, integration, and equality of opportunity described in the AODA and to meeting the needs of people with disabilities, in a timely manner, through the implementation of this policy.

2415228 Ontario Inc. is committed to establishing, maintaining and implementing policies as well as associated practices and procedures in the integrated Regulation, specifically in the areas of information and communications, employment and to meet the accessibility needs of people with disabilities in a timely manner.

2415228 Ontario Inc. is committed to excellence in serving all of our clients, including people with disabilities. When providing information to, or communicating with, a person with a disability, we will provide the information and communication in a manner that takes into account the person’s disability.

2415228 Ontario Inc. is committed to ongoing improvements to accessibility in its premises and facilities as required by law, as well as to the services offered to customers, employees, volunteers and members of the general public.

2415228 Ontario Inc. is committed to promoting values that support relationships between people with disabilities and the organization.

2415228 Ontario Inc. is committed to securing the involvement of people with maintenance, and documentation of a multi-year accessibility plan.

2415228 Ontario Inc. is committed to the establishment, implementation, maintenance, and documentation of a multi-year accessibility plan, which outlines the organizations strategy to prevent and remove barriers and meet its requirements under the integrated Regulation.

2415228 Ontario Inc. is committed to the incorporation of accessibility criteria and features when procuring or acquiring goods, services or facilities.



2415228 Ontario Inc. is committed to the training of all employees, volunteers, persons who deal with customers and the public on 2415228 Ontario Inc.'s behalf, and persons participating in the development and approval of 2415228 Ontario Inc.'s policies, practices and procedures on the requirements under the Integrated Regulation and the Human Rights Code as it pertains to persons with disabilities.

2415228 Ontario Inc. is committed to implementing specific requirements, policies, practices and procedures, and a multi-year plan under the Standards for information, Communication and Employment.

### **Purpose**

The purpose of this Statement of Policy and Procedures is to create a statement of commitment (policy) that provides a framework within which accessibility plans and initiatives are to be created in order to move the organization towards the goal of improved accessibility for people with disabilities. 2415228 Ontario Inc. endeavours to provide accessibility and accommodation as prescribed in the AODA.

The commitments in this policy are intended to ensure that accessibility remains a priority in 2415228 Ontario Inc.'s decision-making process and will serve to assist in ensuring that decisions improve accessibility and do not inadvertently create barriers.

### **Scope**

This policy applies to 2415228 Ontario Inc.'s

- Customers
- Employees
- Volunteers
- Applicants for employment with 2415228 Ontario Inc. who may require employment accommodation through the recruitment, assessment, selection, and hiring process.
- Visitors
- Contractors and subcontractors engaged by 2415228 Ontario Inc.
- Any other third party providing goods, services or facilities on 2415228 Ontario Inc.'s behalf.

### **Responsibility**

The accessibility advisory committee established by 2415228 Ontario Inc. is the administrative entity responsible for the administration of this policy. It is the responsibility of this committee to ensure the application of this policy and that the organization achieves compliance with the law and creates an environment that provides the widest feasible scope of access, which is the right or opportunity to reach, use or participate in the organization's systems, facilities and services.

Managers, immediate supervisors and department heads are responsible for ensuring that all employees follow the guidelines set out in this policy.



Each manager, immediate supervisor and department head is responsible for ensuring that all employees follow the guidelines set out in this policy.

All employees, volunteers, contractors and subcontractors, any other person acting on behalf of 2415228 Ontario Inc., and persons involved in the creation of 2415228 Ontario Inc.'s policies are responsible for adhering to and following the commitments set out in this policy.

### **Procedures**

2415228 Ontario Inc. through its accessibility [advisory committee] will monitor and evaluate accessibility initiatives and changes to applicable legislation and/or regulations. Changes to policies, plans and initiatives will be incorporated as required. 2415228 Ontario Inc. will also report on performance in relation to established accessibility goals and targets.

If you have questions on this policy, want to provide feedback or have a complaint, contact the accessibility advisory committee in the Human Resources Department at 416-754-1444 x 7807 or via email at [hr@collega.com](mailto:hr@collega.com)





III

Policies & Procedures



1

**Communicating with people with disabilities**



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## **Policy**

2415228 Ontario Inc. is committed to communicating with people with disabilities in ways that take into account their disability and in keeping with the principles of dignity, independence, integration and equal opportunity.

This policy provides guidance in considering how to improved communication with people with a disability through general communications, involvement of people with a disability in consultation, or in meetings, during a transaction and producing publications in accessible formats.

This policy applies to all 2415228 Ontario Inc. communications with the public, including in relation to consultation, and the development of pamphlets, flyers, letters, memos, emails, websites, brochures, invoices, papers and reports, among others.

All oral and written communication should seek to be inclusive od and positive toward people with a disability. Avoid phrases that demean people with disabilities (such as unfit, defective or incapacitated), avoid words such as “handicapped,” “crippled” and “wheelchair-bound”. Do not refer to people by categories such as “the blind” or “the disabled”.

## **Purpose**

The purpose of this policy is to ensure that persons with disabilities have communication access that is as effective as that provided to persons without disabilities. To be equally effective, an aid, benefit or service need not produce the identical result or level of achievement for disabled and non-disabled persons; it must afford the person to whom it is provided equal opportunity to achieve equal results, gain equal benefit and reach the same level of achievement.

## **Scope**

This policy applies to all employees and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of managers, immediate supervisors and/or team leaders to ensure that all employees follow the guidelines set out in this policy.

Each manager, immediate supervisor and/or team leader is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

## **Procedures**

*Terminology:* the terminology that we use can influence the way we see people and may unintentionally create a negative perception. The words we use can be very powerful. However unintentional, many words used to describe the nature of a disability can be demeaning and disrespectful. Please refer to the



terminology chart to assist you in making your communication with or without people with disabilities more successful.

The word *“disability”* is more appropriate than *“handicap”* or *“handicapped.”*

Remember to put people first. It is preferable to say *“person with a disability”* instead of *“disabled person.”*

Communication: One key aspect of communication is taking into consideration the specific needs of an individual. Employees may need to utilize a variety of different techniques to best interact with a person with a disability in order to effectively provide goods and services to that individual.

Publications: When preparing material intended to be distributed to the public, 2415228 Ontario Inc. will consider the format of the material and its accessibility to the target audience. In particular 2415228 Ontario Inc. will consider whether alternative formats are required in order to facilitate access by a person with a disability.



2

**Standard for Customer Service**



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## **Policy**

2415228 Ontario Inc. will strive at all times to provide goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

Reasonable efforts will be made to ensure that:

Persons with disabilities are provided equal opportunity to obtain, use and benefit from 2415228 Ontario Inc.'s goods and services;

Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities

The goods and services provided to persons with disabilities are integrated with the provision to others unless an alternative measure is necessary to allow a person with a disability to benefit; the alternative measure may be temporary or permanent;

Communications with a person with a disability are conducted in a manner that takes the person's disability into account;

Persons with disabilities may use assistive devices, service animals and support persons as is necessary to access 2415228 Ontario Inc.'s goods and services unless superseded by other legislation.

## **Purpose**

This policy and its procedures address the accessibility requirements of Regulation 429/07 Accessibility Standards for Customer Service under the Accessibility for Ontarians with Disabilities Act.

## **Scope**

This policy applies to all employees and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of the managers and/or supervisors and/or team leaders to ensure that all employees follow the guidelines set out in this policy.

## **Procedures**

*Communication:* We will communicate with people with disabilities in ways that take into account their disability.



*Telephone Services:* 2415228 Ontario Inc.'s Call Centre is committed to providing fully accessible telephone services to our customers.

**Assistive Devices & Support Persons**

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services.

We are committed to welcoming people with disabilities who are accompanied by a service animal on parts of our premises that are open to the public and other third parties.

We are committed to welcoming people with disabilities who are accompanied by a support person.

**Feedback**

Comments on our services regarding how well expectations are being met are welcomed and appreciated.



3

Use of Assistive devices





## **Policy**

2415228 Ontario Inc. will welcome all customers and the broader public to our facilities by committing our staff and volunteers to providing our goods and services that respect the independence and dignity of people with disabilities. Such access to goods and services incorporate measures that include but are not limited to the use of assistive devices. Customers with disabilities are welcome to use their own personal assistive devices on our premises unless not allowed by law.

## **Purpose**

The purpose of this Statement of Policy and Procedure is to ensure that each facility that is open to the public will, as applicable, post information in the front office, reception area or entrance that indicates the availability of assistive devices and encourages potential users to seek support from staff and volunteers as they require it.

- Communication devices
- Hearing devices
- Visual aids

## **Scope**

This policy applies to all employees and facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

Managers, supervisors and team leaders will ensure that training can be made available to staff in regards to assistive devices for those accessing our facilities.

## **Procedures**

The company welcomes the use of assistive devices and encourages users to seek support from staff and volunteers as they require it.



4

**Use of service animals**



## **Policy**

2415228 Ontario Inc. welcomes people with disabilities who are accompanied by a service animal on the parts of its premises that are open to the public. If a service animal is excluded by law from the premises, 2415228 Ontario Inc. will ensure that alternative means are available to enable the person with a disability to access its goods and services.

## **Purpose**

The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities who are accompanied by a service animal are treated accordingly.

## **Scope**

This policy applies to all employees and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of the managers, supervisors and/or team leaders to ensure that all employees follow the guidelines set out in this policy.

Each manager, supervisor and/or team leaders is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

## **Procedures**

Unless otherwise excluded by law, the customer service standard requires that a person with a disability is permitted to be accompanied by his or her guide dog or other service animal in the areas that are open to the public or third parties.

In the event that a law excludes a service animal, the reason why the animal is excluded should be explained to the individual and reasonable arrangements should be explored.

Service animals are non-participants and therefore whenever possible should be granted free admission to the goods and/or services being accessed by the person with a disability they are accompanying.



5

**Use of support persons**



## **Policy**

2415228 Ontario Inc. is committed to welcoming people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. In the event that a fee is charged in relation to a support person's presence on the company premises or to attend a company sponsored event, advanced notice of the fee will be provided.

## **Purpose**

The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities who are accompanied by a support person are treated accordingly.

## **Scope**

This policy applied to all employees and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of the managers, supervisors and team leaders to ensure that all employees follow the guidelines set out in this policy.

Each manager, supervisor and team leader is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

## **Procedures**

A person with a disability who is accompanied by a support person will be welcomed at 2415228 Ontario Inc.'s premises and events with his or her support person.



6

Training



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## **Policy**

2415228 Ontario Inc. will provide training to all employees, volunteers and others who deal with the public on 2415228 Ontario Inc.'s behalf, and all those who are involved in the development and approval of customer service policies, practices and procedures. Training will be provided as soon as practicable after orientation is administered.

The amount and format of training will be determined

Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

## **Purpose**

The purpose of this Statement of Policy and Procedure is that 2415228 Ontario Inc. is required to provide training to all employees, volunteers, contractors, and others who deal with the public on 2415228 Ontario Inc.'s behalf.

## **Scope**

This policy applies to all employees and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of managers, supervisors and team leaders to ensure that all employees follow the guidelines set out in this policy.

## **Procedures**

Training can include the following elements:

Review of the purposes of the Accessibility for Ontarians with Disabilities Act and the requirements of the customer service standard;

How to interact and communicate with people with various types of disabilities;

How to interact with people with disabilities who use an assistive device, service animal or support person;

What to do if a person with a particular type of disability is having difficulty accessing your goods or services;

Information regarding 2415228 Ontario Inc.'s policies, practices, and procedures relating to the customer service standards.

All new employees should be trained as soon as practicable. It is recommended that training take place within 60 days after commencing employment.



7

**Feedback Process**



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## **Policy**

Upon request, 2415228 Ontario Inc. will provide or will arrange for the provision of accessible formats and communication supports in its feedback processes to ensure that these processes are accessible to persons with disabilities in a timely manner.

2415228 Ontario Inc. encourages and appreciates feedback and comments on the manner in which it provides its information and communications to people with disabilities.

## **Purpose**

The purpose of this Statement of Policy and Procedure is to ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.

## **Scope**

This policy applies to 2415228 Ontario Inc.'s:

- Customer
- Employees
- Volunteers
- Any other parties engaged by the company

## **Responsibility**

It is the responsibility of representatives to ensure the application of this policy and that the organization achieves compliance with the law and creates an environment that provides the widest feasible scope of access, which is the right or opportunity to reach, use or participate in the organization's information and communications systems and services.

## **Procedures**

Those wishing to make feedback comments can do so:

Electronically (by email) at [hr@collega.com](mailto:hr@collega.com)

In person and verbally, at our offices at 210 Lesmill Road, Toronto, ON, M3B 2T5

By telephone at 416-754-1444 x 7807



**Accessibility Standard for Employment**



## **Policy**

2415228 Ontario Inc. is committed to ensuring that people with disabilities have the same opportunity of access to employment opportunities and related services as do all prospective employees and employees.

2415228 Ontario Inc. is committed to meeting the accessibility needs of people with disabilities, in a timely manner, in its human resources practices, processes, policies and procedures and employment related services.

The commitments in this policy are intended to ensure that accessibility remains a priority in 2415228 Ontario Inc.'s decision-making process and will serve to assist in ensuring that decisions improve accessibility and do not inadvertently create barriers.

## **Purpose**

The purpose of this statement of Policy and Procedure is to create a statement of commitment that provides a framework within which accessibility plans and initiatives are to be created in order to move the organization towards the goal of improved accessibility for people with disabilities, specifically with regard to the employment standard in the Integrated Regulation.

## **Scope**

This policy applies to all applicants, prospective employees and employees, and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of the managers, supervisors and team leaders to ensure that all employees follow the guidelines set out in this policy.

## **Procedures**

Employees of 2415228 Ontario Inc. will be made aware that it provides accommodation for applicants with disabilities in its recruitment, assessment and selection process.

2415228 Ontario Inc. will inform employees of its policy supporting employees with disabilities and procedures that provide for job accommodations.

Where an employee with a disability so requests, 2415228 Ontario Inc. will consult with employees to provide or arrange for accessible formats and communication supports in relation to information that is generally available to employees in the workplace and that the employee needs to perform his or her job.

Other arrangements will be made for:



- Workplace emergency response information
- Return-to-work process
- Performance management process
- Career development and advancement
- Redeployment
- Training for staff

2415228 Ontario Inc. is committed to developing policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on applicants, prospective employees and employees with disabilities.

2415228 Ontario Inc. will maintain accurate records of training delivered to staff and make these records available for inspection as may be required.



**Recruitment and selection**



## **Policy**

2415228 Ontario Inc. is committed to transparent and merit based selection in all of its recruiting and hiring decisions. All applicants are given an equal opportunity for employment in compliance with the provisions of the Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act and any other applicable legislation and/or regulations.

## **Purpose**

The purpose of this Statement of Policy and Procedure is to ensure consistent and equitable standards for the recruitment, assessment and selection of prospective employees. Including persons with disabilities, to create a diverse and qualified talent pool to support current and future business needs.

## **Scope**

This policy applies to all applicants, prospective employees and employees, and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of the managers, supervisors and team leaders to ensure that all employees follow the guidelines set out in this policy.

## **Procedures**

All recruitment practices and procedures must comply with the Ontario Human Rights Code. All internal and external candidates shall receive equal treatment with respect to employment without discrimination because of disability.

2415228 Ontario Inc. will seek to recruit employees on the basis of their ability and the requirements of the job posting. No applicant will receive less favourable treatment than another on the grounds of disability.



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Return to work



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## **Policy**

2415228 Ontario Inc. is committed to the provision of workplace rehabilitation that supports and enables injured or sick employees to remain at or return to the workplace to continue the discharge of work duties. This process benefits both the employee and the employer.

2415228 Ontario Inc. is committed to:

- Providing a safe and healthy work environment
- Trying to facilitate a safe and early return to work of injured and ill employees
- Respecting the confidential nature of medical information

## **Purpose**

The purpose of this Statement of Policy and Procedure is to describe the commitment of 2415228 Ontario Inc. to provide for sick and/or injured employees. The policy will provide guidelines to managers/supervisors, employees and the HR department on employees affected by injuries/illness to recover and perform the duties for which they are employed. It also supports a safe return for the employee who has an illness/injury.

## **Scope**

This policy applies to all employees of 2415228 Ontario Inc.

## **Responsibility**

2415228 Ontario Inc. is responsible for:

- Providing a safe and healthy working environment
- Providing suitable duties where practicable, with aim of returning the employee to his/her normal duties
- Return to work plans that return the employee to his/her normal duties
- Respecting the rights and confidentiality of employees
- Ensuring managers, supervisors, employees and all other applicable persons support return the work plans

## **Procedures**

In consultation with the employee, manager, medical practitioner, rehabilitation service or case manager a return to work plan with agreed times frames will be developed and can include some of the following examples:

- Goals of the plan
- List of duties and restrictions
- Accommodations required





- Communication support
- Hours to be worked
- Details of training required
- Anticipated time frame of plan
- Details of any pay adjustments during period
- Formal reviews

Workplace rehabilitation and the return to work plan will conclude when the employee resumes all the prescribed duties for the role to which they were appointed.



11

Disruption of services



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## **Policy**

2415228 Ontario Inc. will make reasonable efforts to provide notice in the event of a planned or unexpected disruption in the facilities or services where it has control over such facilities or services. This notice will include information about the reasons for the disruption, its anticipated duration and description of alternative facilities or services, if available. 2415228 Ontario Inc. will provide notice by posting information in visible places on its premises or by any other reasonable method.

## **Purpose**

The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities know when there is a temporary disruption of service.

## **Scope**

This policy applies to all employees and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of the managers, supervisors and team leaders to ensure that all employees follow the guidelines set out in this policy.

Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

## **Procedures**

If a disruption in service is planned and expected, 2415228 Ontario Inc. should provide notice as far in advance of the disruption as possible as individuals may require considerable time to make alternative arrangements.

If a disruption is unexpected, 2415228 Ontario Inc. should provide notice as soon as possible after the disruption has been identified.



12

**Accessible website and web content**



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## **Policy**

2415228 Ontario Inc. is included in the regulation's definition of an "obligated organization" and must comply with the accessible website requirements of the regulation according to the following schedule:

By January 1, 2014, internet websites and web content will conform to WCAG 2.0 level A

By January 1, 2021, all internet websites and web content must conform to WCAG 2.0 Level AA, other than:

- Success criteria 1.2.4 Captions (Live)
- Success criteria 1.2.5 Audio Descriptions (Pre-recorded)

2415228 Ontario Inc. is committed to the principles of independence, dignity, integration and equality of opportunity described in the AODA customer service standard and to meeting the information and communication needs of people with disabilities, in a timely manner, through the implementation of this policy.

The purpose of this Statement of Policy and Procedure is to address how 2415228 Ontario Inc. will achieve an accessible website and web content through meeting the requirements under the information and communications standard and to ensure all information and methods of online communication to and from a person will be designed to be accessible to Ontarians with disabilities.

## **Scope**

This policy applies to 2415228 Ontario Inc.'s employees and volunteers and all contractors and subcontractors engaged by 2415228 Ontario Inc.

## **Responsibility**

2415228 Ontario Inc.'s I.T. department will:

- Plan how to achieve accessibility
- Implement appropriate solutions
- Create policies and procedures for web accessibility
- Monitor and maintain accessible website(s)



**Procedure**

2415228 Ontario Inc. will actively assess its website and web content to identify, remove and prevent barriers to ensure online information and communications in the company are accessible for all customers.



**Documentation & Annual Filing**



## **Policy**

Documents required by the Accessibility Standards for Customer Service are available upon request. When providing a document to a person with a disability, 2415228 Ontario Inc. will work with the individual to determine options in order to provide the document or the information contained in the document in a format that takes the persons disability into account.

## **Purpose**

The purpose of this Statement of Policy and Procedure is that, per regulations, 2415228 Ontario Inc. is required to post a notice that documents required by the customer service standard are available upon request and in a format that takes a person's disability into account.

## **Scope**

This policy applies to all employees and all facilities of 2415228 Ontario Inc. in Ontario.

## **Responsibility**

It is the responsibility of manager's supervisors and team leaders to ensure that all employees follow the guidelines set out in this policy.

Each manager, supervisor, and team leader is responsible to ensure all employees are trained under the customer service standard and these policy, practices and procedure.

## **Procedures**

Information can be made available in a suitable format that takes the individual's disability into account.





IV

**Multi Year Plan**



## **1. Introduction**

2415228 Ontario Inc. is committed to treating all people in a way that allows them to maintain their dignity and independence. 2415228 Ontario Inc. is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

2415228 Ontario Inc. has set a course to prevent, identify and remove barriers for persons with disabilities. Through its multi-year accessibility plan, 2415228 Ontario Inc. aims to become barrier-free by 2025.

This course includes complying with the following accessibility standards in:

- Customer Service
- Information and Communications
- Employment
- Transportation
- The Built Environment

The multi-year accessibility plan outlines the specific steps 2415228 Ontario Inc. is taking to improve opportunities for persons with disabilities and comply with the phased-in requirements of the Regulation beginning January 1, 2012. The company remains committed to improving accessibility through the identification, removal and prevention of barriers in our organization. Working with our employees and with our customers ensures that accessibility is given significant consideration.



## 2. What is a disability?

According to the Ontario Human Rights Code a “disability” is defined as:

- Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury both 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 remedial appliance or device
- A condition of mental impairment or a development 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.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.



### **3. Identification of barriers**

2415228 Ontario Inc. will assess physical, attitudinal and communication barriers across the company to ensure it removes and prevents barriers to access for persons with disabilities in its organization by January 1, 2014.



#### **4. Accessibility Advisory Committee**

2415228 Ontario Inc. has appointed the Human Resources Department to represent the accessibility policy of the organization. The Human Resources Department will review annually or when there are changes to the law, to practices and procedures or when an incident/breach occurs.



## **5. Plan Maintenance**

2415228 Ontario Inc. will establish, implement and maintain a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements by January 1, 2014.

2415228 Ontario Inc. will review and update the accessibility plan at least once every five years



## **6. Accessible Emergency Information**

2415228 Ontario Inc. is committed to providing the customers and clients with publicly available emergency information in an accessible way upon request. It will also provide employees with disabilities with individualized emergency response information when necessary.



## **7. Training**

2415228 Ontario Inc. will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

2415228 Ontario Inc. will ensure that by January 1, 2015 training is provided to all employees, volunteers, persons who deal with customers and the public on the company's behalf, and to persons participating in the development and approval of its policies, practices and procedures on the requirements of the Regulation and on the Human Rights Code as it pertains to persons with disabilities. 2415228 Ontario Inc. will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws by January 1, 2015:

Training on the requirements of accessibility standards and the Human Rights Code will vary according to the duties of the employee, volunteers or others.

2415228 Ontario Inc. will maintain a record of dates when training is provided and the number of individuals to whom it was provided.

Training will reoccur when there are changes to the accessibility policies.





## **8. Information and communications**

2415228 Ontario Inc. is committed to meeting the communication needs of people with disabilities. It will consult with people with disabilities to determine their information and communication needs.

2415228 Ontario Inc. will upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability by January 1, 2016. This includes:

- Assessing and reviewing the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that exist in the organization.
- Notifying the public about the availability of accessible formats and communication supports
- Consulting with a person with a disability when alternative accessible formats and communication supports are requested.
- Having a process in place for customers to request and to be provided with information and communication in an accessible format and explaining when an accessible format is not feasible.
- Posting the accessibility policy on the organizations website and/or provide the plan in an accessible format upon request.
- Making 2415228 Ontario Inc.'s ASR Policy and Statement of Commitment available in an accessible format upon request.



## 9. Feedback

2415228 Ontario Inc. will ensure that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request by January 1, 2016. This includes:

- When an accessible format is requested, the person making the request will be consulted to determine suitability of the format
- The public will be notified about the availability of accessible formats and communication supports
- Reviewing the policy annually and when changes are made to the law or to practices and procedures or when an incident/breach occurs.

2415228 Ontario Inc. will take the following steps to make sure all publicly available information is made accessible upon request by January 1, 2016:

- Plan to provide a link at the bottom of all web pages with an accessibility statement
- Ensure new internet websites and web content on those sites conform to WCAG 2.0 Level A by January 1, 2014.
- Ensure all websites and web content conform to WCAG 2.0 Level AA other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-Recorded) by January 1, 2021



## **10. Employment**

2415228 Ontario Inc. is committed to fair and accessible employment practices that attract and retain talented employees with disabilities. 2415228 Ontario Inc. will incorporate new accessibility requirements under the employment standard to ensure that barriers in recruitment are eliminated and corporate policies are followed where applicable.

2415228 Ontario Inc. will assess recruitment policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities. In order to meet compliance with Accessibility Standards for Employment under the integrated Regulation requirements and to remove barriers to persons with disabilities, in recruitment, 2415228 Ontario Inc. will ensure the following action is taken by January 1, 2016:

- On the website and in job advertisements, specify that accommodation is available for applicants with disabilities
- Notify employees and the public about the availability of accommodation in its recruitment processes for applicants with disabilities
- Inform candidates about the availability of accommodations:
  - When called for an interview
  - During the selection process
  - At the time of the job offer
  - At orientation
- If the selected applicant requests an accommodation, consult with the applicant and arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs
- When making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities



## **11. Return to work**

2415228 Ontario Inc. will assess its return-to-work and accommodation plans, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities. In order to meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and remove barriers to persons with disabilities, 2415228 Ontario Inc. will do the following by January 1, 2016:

- Include the process and the manner in which the employee requesting accommodation can participate in the development of the plan
- Include the process and the means by which the employee is assessed on an individual basis
- Provide an individualized accommodation plan in writing to any employee with a disability
- Provide an individualized return-to-work plan in writing for any employee who has been absent from work due to disability and requires disability-related accommodations to return to work
- Include any individualized workplace emergency response information
- Identify any other accommodation that is to be provided to the employee

In order to meet compliance with Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities, 2415228 Ontario Inc. will do the following by January 1, 2016:

- Take the accessibility needs of employees with disabilities and their individualized accommodation plans into account:
  - When assessing their performance
  - In managing their career development and advancement
  - When redeploying them
- Review and revise its performance review policy
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities
- Take into account the accessibility needs of employees with disabilities when redeploying employees



**12. For more info:**

For more information on this multi-year accessibility plan please contact a representative in the Human Resources Department at:

•Phone: 416-754-1444 x 7807

•Email: [hr@collega.com](mailto:hr@collega.com)



**Appendix A**

**Notice of Communications and availability of documents**



AVEDA INSTITUTE & ACADEMY SALON

All documents required under the Accessibility Standard for Customer Service, shall be made available to members of the public upon verbal or written request.

To communicate with us, please contact us:

By email: [hr@collega.com](mailto:hr@collega.com)

By phone: 416-754-1444 x 7807

In person: 210 Lesmill Road, Toronto ON, M3B 2T5

2415228 Ontario Inc. will endeavor to make all forms, documents and publications available in alternative formats. Please indicate if you need to receive the above mentioned documents, notices and forms in an alternative format.

Requests for documentation in alternative formats will be forwarded to the department involved in the production of such documentation.

The Human Resources Department will assign a person who will respond to the request in a timely manner and provide the information requested.



**Appendix B**

**Language & Terminology**





***Following is a list of terms that are respectful and observe the requirements of the AODA:***

**Do**

- Disability
- “Person(s) with...” or
- “People with a...”
- Intellectual disability or development disability
- “Person living with...” or
- “Person born with...”
- Blind, partial vision, low vision, vision loss: be specific
- Deaf, deafened, hard of hearing, hearing loss: be specific
- Person who does not speak
- Person in a wheelchair
- Person with a mobility or physical disability
- Mental health disability
- Accessible parking, bathrooms
- Person with epilepsy
- Person born with a disability
- Person who has (as particular condition) or a person who has had a stroke
- Person with a disability, person who has (a particular condition)
- Person with a disability (challenges are environmental conditions)



***Following is a list of terms that are respectful and observe the requirements of the AODA:***

**Don't**

- Handicap, handicapped, invalid or impediment
- The disabled
- Mental retardation, mentally retarded, retarded, mentally challenged, idiot, imbecile, moron, simple, mongoloid
- Suffering, afflicted, victim, stricken
- Visually impaired, the blind
- Deaf (avoid generalizing; try to find preferred term from “do” list)
- Deaf, mute, dumb
- Confined, bound, stuck
- Cripples, cripple, lame, physically challenged
- Insane, lunatic, maniac, mental, neurotic, psychotic, psycho, deviant, crazy; the negative list is too long
- Handicapped parking, bathrooms
- An epileptic
- Birth defect, deformity/deformed, congenital defect
- Victim of (a condition such as multiple sclerosis, a stroke, cerebral palsy)
- Suffers from, afflicted by, stricken with, etc.
- Physically challenged

