

### Intent

This policy is intended to meet the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* and *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Customer Services Standard, the Information and Communications Standard and the Employment Standard, set forth under the *Accessibility for Ontarians with Disabilities Act, 2005* as applicable to WalterFedy. This policy, broken into three sections, applies to the:

1. provision of goods and services for people with disabilities
2. provision of information and communication services and materials for people with disabilities
3. employment of people with disabilities

In addition to this policy, WalterFedy shall follow the principles of dignity, independence, integration and equal opportunity.

### Statement of Commitment

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

### General Requirements

General requirements that apply across all of the three applicable standards, *Employment, Customer Service, and Information and Communications*, and omitting *Transportation* are outlined as follows.

#### Establishment of Accessibility Policies and Plans

WalterFedy will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. WalterFedy has included a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This has been achieved through documentation in WalterFedy's policies and making these documents publicly available, in an accessible format upon request.

WalterFedy has established, implemented, and will maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. WalterFedy will post its accessibility plans on its website, and provide the plan in an accessible format upon request. WalterFedy will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement WalterFedy's accessibility plan and post this status on its website.

## Scope

This policy shall apply to:

- a) every person who deals with members of the public or their agents on behalf of WalterFedy, whether the person is an employee, contractor, volunteer or otherwise, including when the provision of goods and services occurs off the premises of WalterFedy.
- b) all persons who participate in the development of the WalterFedy's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.
- c) the provision of goods and services at premises owned and operated by WalterFedy.
- d) the provision of services at premises frequented by WalterFedy, such as job sites, client meeting places, and otherwise.

This policy does not include the *Integrated Accessibility Standards, Ontario Regulation 191/11* regarding *Transportation Standards* because WalterFedy does not provide any method of public transportation to employees or customers.

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# Accessible Customer Service

## General Principles

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

### A. The Provision of Goods and Services to Persons with Disabilities

WalterFedy will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all clients receive the same value and quality;
- allowing clients with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that clients with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

### B. Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by WalterFedy. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

### C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises. "No pet" policies do not apply to guide dogs, service animals and/or service dogs. If a health and safety concern presents itself for example in the form of a severe allergy to the animal, WalterFedy will make all reasonable efforts to meet the needs of all individuals.

#### *Recognizing a Guide Dog, Service Dog and/or Service Animal:*

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, WalterFedy may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

*Care and Control of the Animal:*

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

#### D. Support Persons

If a customer with a disability is accompanied by a support person, WalterFedy will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations WalterFedy will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

#### E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of WalterFedy. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use WalterFedy's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

*Notifications will Include:*

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

*Notification Options:*

When disruptions occur, WalterFedy will provide notice by:

- posting notices in conspicuous places, including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the WalterFedy website;
- contacting customers with appointments or meetings; or
- by any other method that may be reasonable under the circumstances.

## F. Feedback Process

WalterFedy shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on our external web page and at reception. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request. Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

## G. Training

Training will be provided to:

- a) all employees, volunteers and/or contractors who deal with the public or other third parties that act on behalf of WalterFedy; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.
- c) new employees, volunteers and/or contractors who deal with the public or act on our behalf during orientation
- d) revised training will be provided in the event of changes to legislation, procedures and/or practices

### *Training Provisions:*

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
  - use assistive devices;
  - require the assistance of a guide dog, service dog or other service animal; or
  - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- WalterFedy's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

### *Record of Training:*

WalterFedy will maintain a record of training that includes the dates training was provided and the number of employees who attended the training.

## H. Notice of Availability and Format of Documents

WalterFedy shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information on the WalterFedy website and/or any other reasonable method.

# Accessible Information & Communications Standards

## General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. Accessible Formats and Communication Supports
- B. Accessible Websites and Web Content
- C. Education and Training Resources
- D. Emergency Procedures, Plans or Public Safety Information
- E. Feedback
- F. Exceptions

### A. Accessible Formats and Communication Supports

WalterFedy will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual. WalterFedy will take into account the person's accessibility needs when customizing individual requests.

### B. Accessible Websites and Web Content

All departments governed by WalterFedy will make web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. Web content includes any information which resides on an Internet or Intranet web site.

### C. Education and Training Resources

WalterFedy will ensure that educational or training institutions (as defined in the regulation) provide training materials and learning courses in accessible formats. These accessible formats must take into account the needs of students with disabilities. Student records and program information such as course requirements, descriptions and availability must be made available in accessible formats, upon request. WalterFedy will keep a record of the training provided, including the dates on which the training was given, and the number of individuals to whom it was provided.

### D. Emergency Procedures, Plans or Public Safety Information

WalterFedy is responsible for providing safety information in an accessible format or with appropriate communication support as soon as practicable, upon request.

### E. Feedback Process

WalterFedy has processes in place for receiving and responding to feedback which are accessible to persons with disabilities through providing or arranging for the provision of accessible formats and communications supports, upon request. WalterFedy has notified the public about the availability of these accessible formats.

## F. Exceptions

The *Information and Communications Standard* does not apply to products and product labels; unconvertible information or communications; or information that the organization does not control directly or indirectly through a contractual relationship. If the organization determines that information or communications are unconvertible, the organization should provide the person requesting information or communication with the following:

- An explanation as to why the information or communications are unconvertible;
- A summary of the unconvertible information or communications;
- Information is regarding as *unconvertible* if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.

# Accessible Employment

## General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. Employment of Persons with Disabilities
- B. Recruitment for Future Employees
- C. Training
- D. Accessible Formats & Communication Support
- E. Workplace Emergency Response Information
- F. Individual Accommodation Plans
- G. Return to Work Process and Redeployment
- H. Career Development

### A. Employment of Persons with Disabilities

WalterFedy will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all employees receive the same value and quality;
- allowing employees with disabilities to do things in their own ways, at their own pace when working as long as this does not present a safety risk;
- using alternative methods when possible to ensure that employees with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing employment; and
- communicating in a manner that takes into account the employee's disability.

### B. Recruitment, Selection and Assessment for Future Employees

WalterFedy will notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

During a recruitment process, WalterFedy shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, WalterFedy shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

#### *Notice to successful applicants*

When making offers of employment, WalterFedy shall notify the successful applicant of its policies for accommodating employees with disabilities.

### C. Training

WalterFedy will provide training for its employees and volunteers regarding the IASR and the Ontario *Human Rights Code*, and will maintain a record of training that includes the dates training was provided and the employees who attended the training. Training will be provided for individuals who are responsible for developing WalterFedy's policies. WalterFedy shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

### D. Accessible Formats & Communication Support

WalterFedy shall consult with the employee with a disability to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job and information that is generally available to employees in the workplace. WalterFedy shall consult with the employee making the request in order to determine the suitability of an accessible format or communication support.

### E. Workplace Emergency Response Information

WalterFedy shall provide individualized workplace emergency response information to employees who have a disability. WalterFedy shall review the individualized workplace emergency response information, when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed, and when WalterFedy reviews its general emergency response policies.

### F. Individual Accommodation Plans

The process for the development of documented individual accommodation plans shall include the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual basis.
- The manner in which WalterFedy can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability

### G. Return to Work Process & Redeployment

WalterFedy shall develop individualized return to work processes for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work and shall document the process. The written procedure shall:

- Outline the steps WalterFedy will take to facilitate the return to work of the employee who was absent because their disability required them to be away from work
- Use documented individual accommodation plans as part of the process
- Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities

### H. Career Development

WalterFedy shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when implementing its performance management process, and when providing career development and advancement.

## Administration

If you have any questions or concerns about this policy or its related procedures please contact:

Victoria Campbell, Human Resources  
519-576-2150 x213  
111-675 Queen Street South, Kitchener, ON N2M 1A1  
vcampbell@walterfedy.com  
www.walterfedy.com

This policy and its related procedures will be reviewed as required in the event of legislative changes.

## Appendix A - Definitions

Accessible Formats – include but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Communication Supports – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready – an electronic or digital format that facilitates conversion into an acceptable format.

Designated Public Sector Organization – refers to every municipality and every person or organization listed in Column 1 of Table 1 of *Ontario Regulation 146/10* (Public Bodies and Commission Public Bodies—Definitions) made under the *Public Service of Ontario Act, 2006*.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 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.

Educational or Training Institution – is and institution governed by the *Education Act* or the *Private Career Colleges Act, 2005*; offers all or part of a post-secondary program leading to a degree pursuant to a consent granted under the *Post-secondary Education Choice and Excellence Act, 2005*; a designated public sector organization (defined in the regulation); a public or private organization that provides course or programs or both, that result in the acquisition by students of a diploma or certificate named by the Minister of Education as defined in the *Education Act*.

Educator – is an employee who is involved in a program or course design, delivery and instruction, including staff of school boards.

Extranet Website – a controlled extension of the Intranet, or internal network of an organization to outside users over the Internet.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

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

Internet Website – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.

Intranet Website – an organization's internal website that is used to privately and securely share any part of the organization's information or operational systems within the organization and includes extranet websites.

Kiosk – an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products.

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

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

School Board – a board as defined in subsection 1 (1) of the *Education Act*.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

Web Content Accessibility Guidelines – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0."

## Appendix B - Referenced Documents

- Accessibility for Ontarians with Disabilities Act, 2005  
[http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_05a11\\_e.htm#BK19](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm#BK19)
- Integrated Accessibility Standards, Ontario Regulation 191/11  
[http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws\\_src\\_regs\\_r11191\\_e.htm#BK0](http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm#BK0)
- Ministry of Community and Social Services, *Making Ontario Accessible* (Access ON)  
<http://www.mcscs.gov.on.ca/en/mcscs/programs/accessibility/index.aspx>
- Ontario Human Rights Code, 1990  
[http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90h19\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm)
- WWW Consortium Web Content Accessibility Guidelines 2.0  
<http://www.w3.org/WAI/intro/wcag>
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990