

ACCESSIBILITY FOR ONTARIANS WITH DISABILITY ACT (AODA)

Disability impacts the lives of many Ontarians and the numbers of people with disabilities is increasing.

- In 20 years, one in five Ontarians are likely to have some kind of disability compared with approximately one in seven today
- 10 – 20% of the general population have hearing loss; 50% of people over 65 have hearing loss
- 600,000 Canadians have self-identified as having vision loss
- 6% of people with physical disabilities use a wheelchair
- 70% of disabilities are hidden and often forgotten
- Many of our veterans have disabilities. Men and women, who want to carry on their life activities with friends and family, will demand access to do so
- It is projected that the older population will double in the next 25 years

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is Provincial Legislation with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.

Ontario Regulation 429/07 entitled “Accessibility Standards for Customer Service” came into force on January 1, 2008. This regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or other third parties.

PURPOSE & SCOPE

This policy is in accordance with the Accessibility Standards for Customer Service Ontario Regulation 429/07 and Accessible Employment Standards addresses the following:

- The provision of goods and services to persons with disabilities
- The use of assistive devices by persons with disabilities
- The use of service animals by persons with disabilities
- The use of support persons by persons with disabilities
- Notice of temporary disruptions in services and facilities
- Hiring
- Workplace information
- Talent and performance management
- Communicate accessibility policies
- Employee training
- Customer feedback regarding the provision of goods and services to persons with disabilities
- Notice of availability and format of documents and meetings

SCOPE

This policy applies to all full-time, part-time, casual, temporary employees, consultants, and independent contractors. Sub-contractors are afforded the same rights and protections provided by this policy, while performing authorized activities for COC | à toi. This may include off-site job-related functions, social events, courses, and classes related to work and employment, or any other function where an employee is representing the Company on or off site.

POLICY STATEMENT

It is the policy of COC | à toi (the “Company”), that its working, living and learning environments will be maintained free from discrimination and harassment as prohibited by the Ontario Human Rights code (1962), and the Accessibility for Ontarians with Disabilities Act (2005) (AODA).

It is the policy of the Company that every employee, visitor, client and customer has a right to equitable treatment with respect to employment, services, goods, facilities, accommodation and membership in vocational associations without discrimination in accordance with the provisions of the Ontario Human Rights Code (1962).

The Company is committed to providing accessible service for its employees, visitors, and customers. Goods and services will be provided in a manner that is based upon the principles of dignity, independence, integration and equal opportunity to all employees, visitors, and customers. The provision of goods and services to persons with disabilities will be integrated wherever possible. Persons with disabilities will benefit from the same services, in the same place and in a similar way as other employees, visitors, clients and customers.

OUR MISSION

COC | à toi values excellence in customer service for everyone who may benefit from our goods and services. This policy supports the principles as it provides respectful services that focus on the unique needs of each individual. This policy enables the Company to ensure that persons with disabilities have access to accessible and exceptional customer service.

DEFINITIONS

(from Accessibility for Ontarians with Disabilities Act, 2005)

Disability: Shall mean,

- a) 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 coordination, blindness or visual impairment deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device
- b) A condition of mental impairment or a developmental disability
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- d) A mental disorder, or
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Accessible: Capable of being entered or reached, approachable; easy to get at; capable of being influenced, obtainable; able to be understood or appreciated.

Assistive Device: A device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the customer Service Standard.

Communication: A process of providing, sending, receiving and understanding information.

Dignity: Respecting and treating every person including persons with a disability as valued and as deserving of effective and full service as any other customer. Do not treat people with disabilities as an afterthought or force them to accept lesser service, quality or convenience.

Equal Opportunity: Having the same chances, options, benefits and results as others. In case of services it means that people with disabilities have the same opportunity to benefit from the way goods and services are provided to others. They should not have to make significant more effort to access or obtain service. They should also not have to accept lesser quality or more inconvenience.

Independence: Freedom from control or influence of others, freedom to make your own choices.

Integration: Services that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Some integration does not serve the needs of all people and disabilities. In these cases, it is necessary to use alternative measures to provide goods or services.

Guide Dog: A dog trained as a guide for a person who is blind and having the qualifications prescribed by the regulations.

Service Animals: Animals that are used as a service animal for a person with a disability.

Support Person: An individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services.

PROVIDING GOODS & SERVICE TO PERSONS WITH DISABILITIES

The Company is committed to excellence in serving all employees, visitors, clients and customers including persons with disabilities and will carry out its functions and responsibilities to ensure that policies, practices and procedures are consistent with the following principles:

- a) The Company's goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- b) The provision of the Company's goods and services to persons with disabilities is integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person with a disability to obtain, use or benefit from the Company's goods or services;
- c) Persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain use or benefit from the Company's goods and services, and
- d) To ensure the best possible customer service, the Company encourages open two-way communication and expects persons with disabilities to communicate their need for accommodation or assistance if it is not clear how that need can be met.

COMMUNICATION

The Company is committed to communicating with persons with disabilities in ways that take into consideration their disability. This means employees will have to consider how the disability affects the way that the person expresses, receives or processes communication. What may be an effective way of providing information for one person with a disability may not be for another. The goal is to communicate in an effective manner. To ensure this,

- Employees, visitors, clients and customers with disabilities will be offered alternative communication formats that will meet the needs of the customer as promptly as feasible;
- Documents will be provided to employees, visitors, clients and customers in an alternative format that will meet the needs of the user in a timely fashion;
- If telephone communication is not suitable for employees, visitors, clients or customer's needs, alternative forms of communication will be offered as required, and
- Use an assistive device or service when it is necessary

USE OF SERVICE ANIMALS, ASSISTIVE DEVICES, & SUPPORT PERSONS

The Company will ensure that the access, use and benefit of goods or services are not compromised for persons with disabilities who require assistive devices, or who are accompanied by a service animal, guide dog or support person.

Service Animals

Service animals, such as, but not limited to Guide dogs, Hearing dogs, Seizure Response dogs, and other certified service animals shall be permitted entry to all the Company's locations that are open to the public.

Service animals are not permitted:

Where food preparation is being undertaken or, as otherwise disallowed by law, or where there is a safety concern. In the rare case where a service animal is to be denied access to a facility or meeting room, other accommodations may be afforded, such as:

- a) Alternate meeting format, e.g. teleconference where technology permits
- b) Delivery of goods or service at an alternate time or location
- c) Other assistive measures available to deliver a good or service to ensure equality of outcome

Assistive Devices

Persons with disabilities shall be permitted to obtain, use or benefit from goods or services through the use of their own assistive devices. Exceptions may occur in situations where the Company has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises. In these situations, if a person with a disability is hindered from accessing goods or services, the Company will accommodate the individual by providing an alternative where possible.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times. The Company will ensure that employees are trained as required to use assistive devices available on Company premises, including, but not limited to computers and software such as Kurzweil, Dragon, Zoomtext, electronic recorders and other devices that may become available.

Support Persons

The Company is committed to welcoming employees, visitors, clients and customers with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter Company premises with his or her 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 Company premises.

If admission to an event is permitted and fees are being paid by the Company, the support person is permitted to attend at no cost for admission. Cost for other services (e.g. food, lodging etc.) will be the responsibility of the support person. If a support person is necessary for the health and safety of a person with disabilities, or for the health and safety of other persons, the Company will require the accompaniment of a support person on Company premises.

The employee, visitor, client or customer shall determine whether a support person is necessary, however, where an employee believes that a support person should be in attendance to protect the health and safety of the customer or others, the following criteria shall be used in consulting with the individual:

- a) When there is a significant risk to the health and safety of the person with a disability or to others (the mere possibility of risk is insufficient)
- b) When the risk cannot be eliminated or reduced by other means
- c) When the assessment of the risk is based on consideration of the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm
- d) When the assessment of the risk is based on the individual's actual characteristics, not merely on generalizations, misperceptions, ignorance or fears about a disability

BILLING

The Company is committed to providing accessible invoices to all of our clients and will make every effort to provide alternative formats of invoices in a timely manner upon request.

NOTICE OF TEMPORARY DISRUPTION TO FACILITIES OR SERVICES

In the event that a planned temporary service disruption occurs that would limit a person with a disability from gaining access to the Company's offices, goods or services, the Company will make the disruption known to clients with ample notice. If a disruption is unexpected, the Company will notify employees, visitors, clients and customers as soon as possible.

The Company will make the disruption known in the following ways:

- a) At the Restaurant, the General Manager will be responsible for posting the notice
- b) All notices of disruption of service must be sent to the Director of Operations, and will post the messages on the Company's website at <https://www.COC | à toirestaurant.com/> and the Company's voicemail

Notices will include information about the reason for the disruption, its anticipated duration, alternate service locations if applicable, and a description of alternative facilities or services if available from the affected service department. If an unexpected disruption occurs, persons with disabilities will be accommodated by the use of other possible means to deliver the goods and service.

ACCESSIBLE EMPLOYMENT STANDARDS

HIRING

Hiring the right candidate is a very important aspect to the Company's success. In order to do so, COC | à toi welcomes and encourages applications from people with disabilities.

Accommodations are available on request for candidates taking part in all aspects of the selection process. If accommodation is required, the hiring committee will discuss the needs with the candidate and make the applicable adjustments to support them.

WORKPLACE INFORMATION

COC | à toi will provide any information that an employee needs to perform their job and general information in accessible format upon request. This includes, but not limited to job descriptions, manuals, newsletters, policies, health & safety information, memos etc. Management will work with individuals to ensure they receive information in the best method for them.

The Company will also provide accessible emergency information to staff once management has been made aware of an employee who needs accommodation in an emergency situation. This will be updated on an as need basis, based on the needs and accommodations that are needed.

TALENT AND PERFORMANCE MANAGEMENT

The Company is always wanting employees to perform to the best of their abilities and be challenged. Part of that process is completed through a talent, performance and career development program. This includes any training that is needed, performance reviews and feedback, and career planning.

The Company will take into consideration any employee that needs accommodation during these processes. The employee will work with management to identify the best way for the employee to receive and go through the different processes of the talent and performance, and career development.

COMMUNICATE ACCESSIBILITY POLICIES

As new policies are created, and updated, employees will be made aware of the policies, including the policies that are specific to support people with disabilities. New employees will be made aware when they are hired. Employees will be made aware of these policies through any or all of the following methods:

- newsletters
- emails
- memos
- bulletin boards
- staff meetings
- one on one conversations

The Company will notify all employees within one (1) business day of the policy becoming effective.

STAFF TRAINING

The Company will provide AODA training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

AODA training will be provided to all full-time employee groups of the Company, part-time, temporary placement, contract employees, and volunteers. This training will be provided as a condition of employment to all new staff and on an ongoing basis for staff to ensure all staff stays current with any policy or procedural changes as it relates to the AODA Act.

Training is available in accessible formats and in multiple formats, including, but not limited to, face to face instruction, online training module, and other formats as requested. Training will include:

- 1) The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard, and the accessible employment standards
- 2) How to interact and communicate with customers with disabilities guided by the principles of dignity, independence and equality
- 3) How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- 4) How to use the assistive devices available on the premises that may assist with the provision of goods or services to people with disabilities, which include, but are not limited to, computers and software such as Kurzweil, Dragon, Zoomtext, electronic recorders and other devices that may become available
- 5) What to do if a person with a disability is having difficulty accessing goods and services at the Company
- 6) Current policies, practices and procedures relating to the customer service standard, and accessible employment standards.