

# **PROVINCIAL INDUSTRIAL ROOFING & SHEET METAL CO. LTD.**

## **ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES**

O. Reg. 429/07

O. Reg. 191/11

## **Policy and Processes**

## Contents

ACCESSIBILITY POLICY .....	4
Introduction .....	4
Monitoring & Reviewing Progress .....	4
ONTARIO ACCESSIBILITY POLICY STATEMENT .....	5
PERSONS WITH DISABILITIES .....	6
Training for Staff .....	6
Who Will Receive the Training .....	7
Accountability .....	8
Responsibilities .....	8
Responsibilities of Management .....	8
Responsibilities of Employees .....	8
Offences (O. Reg. 191/11) (Integrated Accessibility Standards) .....	8
Definitions .....	9
Definition of Disability and Being Alert to Barriers .....	9
Accessibility .....	9
Assistive Device .....	9
Barrier .....	9
Disability .....	9
Guide Dog or Service Animal .....	9
Support Person .....	9
What is a Customer? .....	10
Principles .....	10
Serving People with Disabilities .....	10
Introduction .....	11
People With Physical or Mobility Disabilities .....	11
People With Vision Loss .....	12
People With Hearing Loss .....	12
People Who Are DeafBlind .....	13
People With Speech or Language Disabilities .....	13
People With Learning Disabilities .....	14
People With Developmental Disabilities .....	14
People With Mental Health Disabilities .....	14
People Who Use Service Animals .....	15

People With A Support Person .....	17
People Who Use Assistive Devices .....	18
Serving People with Disabilities – At Home or Over the Phone .....	19
Notice of Temporary Disruption .....	19
Feedback .....	20
Notice of Availability of and Format of Documents .....	21
Format of Documents.....	21
BARRIERS AND SOLUTIONS .....	22
ACKNOWLEDGEMENT FORM.....	24

# **ACCESSIBILITY POLICY**

## **Introduction**

In 2005, the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA). Its goal is to make Ontario accessible by 2025, by creating and enforcing accessibility standards. These standards are rules that businesses and organizations in Ontario must follow to identify, remove and prevent barriers so that people with disabilities will have more opportunities to participate in everyday life. Standards address key areas of daily life, such as customer service, information and communications, and employment. Several accessibility standards are contained in one regulation under the AODA called the Integrated Accessibility Standards Regulation (O. Reg. 191/11), also known as the IASR.

### **The IASR is now law.**

To ensure support for and compliance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and relevant regulations, **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** will make every reasonable effort to ensure that it provides accessible customer service to people with various kinds of disabilities and respects the core principles on independence, dignity, integration and equal opportunity, as defined herein.

When you think about accessibility, there are both visible and non-visible barriers. Structural barriers such as stairs or doorways often come to mind first, but sometimes a certain process or policy can create barriers unintentionally. Or providing information in a format that may not be accessible to everyone can create a barrier. Attitudinal barriers can be based on stereotypes or lack of understanding, but they are within our power to change.

### **References in this policy will be as follows:**

O. Reg. 191/11 – Integrated Accessibility Standards Regulation

O. Reg. 429/07 – Accessibility Standards for Customer Service

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11

## **Monitoring & Reviewing Progress**

To measure the success of this accessibility plan, **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** will consider checking its progress every 12 months, or more so if deemed necessary. We will review and update the accessibility plan at least once every five years and will be posted. Reviewing the plan prior to reporting it to the government will give our organization the opportunity to see what it has accomplished and what the organization still needs to do.

## **ONTARIO ACCESSIBILITY POLICY STATEMENT**

**Provincial Industrial Roofing & Sheet Metal Co. Ltd.** is committed to providing an accessible environment in which all individuals have equal access to our goods and services in a way that respects the dignity and independence of persons with disabilities. Our company will ensure to promote inclusive environment that is considerate and accommodating for all individuals, including people with disabilities.

**Provincial Industrial Roofing & Sheet Metal Co. Ltd.** will provide training to employees who deal with the public or other third parties on our behalf. We will ensure that our employees are trained and familiar with ways of communication, and in use of various assistive devices we have on site that may be used by persons with disabilities while accessing our goods or services.

We recognize the importance of service animals and allow them on the parts of our premises that are open to the public. A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** will notify customers promptly. A posted notice will include the reason for the disruption, its expected length of time, and a description of alternative facilities or services, if available.

Comments and suggestions on how to make our premises more accessible and more inclusive are encouraged.

Any policy of **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** that does not respect dignity and independence of people with disabilities will be either modified or removed. We will continue to prevent attitudes which devalue and limit the potential of persons with disabilities by designing and supporting inclusive and positive attitudes.



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David Uglow

President

July 3, 2023

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Date

## **PERSONS WITH DISABILITIES**

**Provincial Industrial Roofing & Sheet Metal Co. Ltd.** is a professional service provider committed to providing high-quality, cost-effective services that keep pace with rising public expectations.

**Provincial Industrial Roofing & Sheet Metal Co. Ltd.** strives at all times to provide goods and services in a way that respects the dignity and independence of persons with disabilities.

**Provincial Industrial Roofing & Sheet Metal Co. Ltd.** is committed to ensuring that customers with disabilities receive accessible goods and services with the same quality and timeliness that others do.

### **Training for Staff**

#### **O. Reg. 429/07 s. 6**

- (1) Every provider of goods or services shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities:**
  - 1. Every person who deals with members of the public or other third parties on behalf of the provider, whether the person does so as an employee, agent, volunteer or otherwise.**
  - 2. Every person who participates in developing the provider's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. O. Reg. 429/07, s. 6 (1).**
- (2) The training must include a review of the purposes of the Act and the requirements of this regulation and instruction about the following matters:**
  - 1. How to interact and communicate with persons with various types of disability.**
  - 2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.**
  - 3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.**
  - 4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services. O. Reg. 429/07, s. 6 (2).**
- (3) The training must be provided to each person as soon as practicable after he or she is assigned the applicable duties. O. Reg. 429/07, s. 6 (3).**
- (4) Training must also be provided on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities. O. Reg. 429/07, s. 6 (4).**

- (5) Every designated public-sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare a document describing its training policy, and the document must include a summary of the contents of the training and details of when the training is to be provided. O. Reg. 429/07, s. 6 (5).
- (6) Every designated public-sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. O. Reg. 429/07, s. 6 (6).

### **Who Will Receive the Training?**

The training must be provided to:

- All employees and volunteers, including paid and unpaid positions
- Anyone who participates in developing the organization's policies, which might include managers, senior leaders, boards of directors, business owners and independent operating regulated professionals
- Anyone who provides goods, services or facilities on behalf of the organization, which might include outsourced services, such as payroll, facilities management and contact centers.
- New staff who deal with members of the public or other third parties or who participate in developing our policies, practices and procedures on the provision of goods or services to the public or other third parties in accordance with the training requirements set out in the standard. Training will be provided as soon as is practicable after they are assigned applicable duties.
- We will ensure that every person who participates in developing our policies, practices and procedures governing the provision of goods or services to members of the public or other third parties is trained.

Provincial Industrial Roofing & Sheet Metal Co. Ltd. will provide training on customer service to all employees within our organization.

Provincial Industrial Roofing & Sheet Metal Co. Ltd. will provide staff with training that includes:

- A review of the purpose of the AODA and the requirements of the Accessibility Standards for Customer Service;
- How to interact and communicate with persons with various types of disabilities;
- How to interact with persons with disabilities who use assistive devices or require the assistance of service animals or support persons;
- How to use the equipment or devices available on the provider's premises (or otherwise) that may assist with the provision of goods or services to persons with disabilities;
- What to do if a person with a disability is having difficulty accessing Provincial Industrial Roofing & Sheet Metal Co. Ltd. goods and services; and
- Provincial Industrial Roofing & Sheet Metal Co. Ltd. policies, practices and processes on the provision of goods or services to persons with disabilities.

Staff will be trained on policies, practices and processes that affect the way goods and services are provided to persons with disabilities. Training will also be provided on an ongoing basis when changes are made to these policies, practices and processes.

## **Accountability**

All staff of Provincial Industrial Roofing & Sheet Metal Co. Ltd. shall use due diligence to ensure the company complies with legislation by acting in accordance with the provision of this policy and supporting processes.

## **Responsibilities**

### **Responsibilities of Management**

- Educate employees and ensure compliance with all aspects of the policy.
- Demonstrate behaviours that are consistent with this policy.
- Provide support and guidance to staff members in fulfilling the policy.
- Ensure all staff are trained according to the requirements of the legislation.
- When aware of areas of non-compliance ensure appropriate action is taken.

### **Responsibilities of Employees**

- Comply with all aspects of the policy.
- Demonstrate behaviours that are consistent with the policy.

## **Offences (O. Reg. 191/11) (Integrated Accessibility Standards)**

It is an offence to:

- provide false or misleading information to a director or in an accessibility report
- fail to comply with an order made under the AODA
- block or fail to cooperate with an inspection
- intimidate, coerce, penalize or discriminate against someone for seeking enforcement of the AODA, cooperating with an inspection or providing information as part of an inspection.

There are fines for persons or organizations convicted of an offence under the AODA.

The fines are:

- up to \$50,000 for each and every day or part day that an offence happens
- for a corporation, up to \$100,000 for each and every day or part day that an offence happens.
- All directors and/or officers of a corporation must take all reasonable care to prevent the corporation from committing an offence. Failure to do so is an offence. The directors and/or officers of a corporation are liable to a fine of up to \$50,000 for each and every day or part day that the offence happens (PART X, section 37).



## **Definitions**

**Definition of Disability and Being Alert to Barriers** - The Act uses the same definition of “disability” as the Ontario Human Rights Code, which includes physical disabilities, as well as vision, hearing, speech, developmental, learning and mental health disabilities. A disability can be temporary or permanent.

**Accessibility** — The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment

**Assistive Device** – shall mean an auxiliary aid such as communication aid, cognition aid, personal mobility aid and medical aid (i.e. canes, crutches, wheelchairs, or hearing aids etc.) to access and benefit from the goods and services offered by **Provincial Industrial Roofing & Sheet Metal Co. Ltd.**

**Barrier** – means anything that prevents a person with a disability from fully participating in all aspects of society because of the disability. Barriers may include a physical, architectural barrier as well as, an information or communication barrier, technological barriers, a policy, procedure or a practice.

**Disability** - means any degree of physical disability including, but not limited to, diabetes, epilepsy, brain injury, paralysis, amputation, lack of coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, physical reliance on a guide dog, other animal, wheelchair or other remedial appliance or device; mental impairment or device; mental impairment or developmental disability; learning disability or dysfunction in understanding or using symbols or spoken language; mental disorder; or injury for which benefits were claimed or received under the Workplace Safety and Insurance Act, 1997.

**Guide Dog or Service Animal** – a “guide dog” means a guide dog as defined in Section 1 of the Blind Persons’ Rights Act.

For the purpose of this policy, an animal is a service animal of a person with a disability if:

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

**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 or medical needs or with access to goods or services. A support person may be a paid support worker, a volunteer, a friend or a family member; the support person does not need to have special training or qualifications.

## What is a Customer?

A customer can be anyone who is accessing your organization's goods, services or facilities. They may include paying and non-paying members of the public, and individuals your organization might call customers, such as clients, members, patrons, or patients. Customers can also be other businesses or organizations (also referred to as 'third parties')

## Principles

**Dignity** - service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.

**Equal Opportunity** – service is provided to a person with a disability in such a way that they have an opportunity to access **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** goods or services equal to that given to others.

**Independence** – when a person with a disability has the freedom to do things on their own without unnecessary help or interference from others.

**Integration** – service is provided in a way that allows the person with a disability to benefit from the same services, in the same place and in the same or similar way as other customers, unless an alternate measure is necessary to enable a person with a disability to access goods or services.

## SERVING PEOPLE WITH DISABILITIES

### Accessibility for Ontarians with Disabilities Act, 2005 – O. Reg. 429/07

#### s. 3. Establishment of Policies, Practices and Procedures

- (1) Every provider of goods or services shall establish policies, practices and procedures governing the provision of its goods or services to persons with disabilities. O. Reg. 429/07, s. 3 (1).
- (2) The provider shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:
  1. The goods or services must be provided in a manner that respects the dignity and independence of persons with disabilities.
  2. The provision of goods or services to persons with disabilities and others must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
  3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services. O. Reg. 429/07, s. 3 (2).
- (3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the provider's goods or services or the availability, if any, of other measures which enable them to do so. O. Reg. 429/07, s. 3 (3).

- (4) When communicating with a person with a disability, a provider shall do so in a manner that takes into account the person's disability. O. Reg. 429/07, s. 3 (4).
- (5) Every designated public-sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare one or more documents describing its policies, practices and procedures and, upon request, shall give a copy of a document to any person. O. Reg. 429/07, s. 3 (5).

## **Introduction**

Accessible customer service is about

- not making assumptions about what a person can or cannot do because of their disability
- inclusion – making everyone feel welcome and included
- understanding that people with disabilities may have different needs

Serving customers with disabilities is also about showing sensitivity and respect. Provincial Industrial Roofing & Sheet Metal Co. Ltd. is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Provincial Industrial Roofing & Sheet Metal Co. Ltd. understands that obligations under the Accessibility for Ontarians with Disabilities Act 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or Obligations to people with disabilities under any other law.

Provincial Industrial Roofing & Sheet Metal Co. Ltd. is committed to complying with both the Ontario Human Rights Code and the AODA.

Provincial Industrial Roofing & Sheet Metal Co. Ltd. is committed to excellence in serving all customers including people with disabilities.

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

## **Use the right words**

- Use “disability” not “handicapped”.
- Remember to put people first. Say ‘person with a disability’ rather than ‘disabled person’.
- Avoid sympathetic statements such as victim of, suffers with, confined to a wheelchair, physically challenged, or stricken with a particular illness or disability.

## **People With Physical or Mobility Disabilities**

Only some people with physical disabilities use a wheelchair. Someone with arthritis may use a cane or walker, while someone with a heart or lung condition may not use a mobility device but may have difficulty walking longer distances.

## **Recommendations**

- Ask before you help. People with disabilities often have their own ways of doing things.
- Don't touch or move a person's equipment (e.g. walker, wheelchair) without permission.
- If you have permission to move a person's wheelchair, don't leave them in an awkward, dangerous or undignified position, such as facing a wall or in the path of opening doors.
- If you need to have a lengthy conversation with someone who uses a wheelchair or scooter, consider sitting so you can make eye contact at the same level.
- Think ahead and remove any items that may cause a physical barrier, such as boxes left in an aisle.
- If a service counter at our place of business is too high for a person using a wheelchair to see over, step around it to provide service. Have a clipboard handy if filling in forms or if a signature is required.
- Keep in mind that a person's physical disability may not be visible or obvious. For example, a person may have difficulty standing for long periods of time and may ask to sit while waiting to be served.

## **People With Vision Loss**

Vision loss can restrict someone's ability to read documents or signs, locate landmarks or see hazards. Some people may use a guide dog, a white cane, or a support person such as a sighted guide, but others may not.

## **Recommendations**

- When someone has vision loss, don't assume the individual can't see you. Not everyone with vision loss is totally blind, many have some vision.
- Identify yourself when you approach, and speak directly to the customer if they are with a companion.
- Ask if they would like you to read any printed information out loud to them, such as a bill or schedule of fees.
- When providing directions or instructions, be precise and descriptive.
- Offer your elbow to guide them if needed. If they accept, lead – don't pull.
- Identify landmarks or other details to orient the person to the surroundings. For example, if you're approaching stairs or an obstacle, say so.
- If you need to leave the customer, let them know by telling them you'll be back or saying good-bye.
- Don't leave the customer in the middle of a room – guide them to a comfortable location.

## **People With Hearing Loss**

People who have hearing loss may identify in different ways. They may be deaf, oral deaf, deafened, or hard of hearing. These terms are used to describe different levels of hearing or the way a person's hearing was diminished or lost.

A person with hearing loss may have preferred ways to communicate, for example, through sign language, by lip reading or using a pen and paper.

We can offer conferences might offer real-time captioning services (on-screen typing of what speakers are saying), assistive listening systems, or sign language interpreters or intervenors upon request so that people who are Deaf, deafened, oral deaf, hard of hearing or deafblind may participate effectively

## **Recommendations**

- Once the customer has self-identified as having hearing loss, make sure you face the customer when talking and that you are in a well-lit area, so the person can see you clearly.
- As needed, attract the person's attention before speaking. Try a gentle touch on the shoulder or wave of your hand.
- Maintain eye contact. Use body language, gestures and facial expression to help you communicate.
- If the person uses a hearing aid, reduce background noise or if possible, move to a quieter area.
- If necessary, ask if another method of communicating would be easier, for example, using a pen and paper.
- When using a sign language interpreter, look and speak directly to the customer, not to the interpreter. For example, say "What would you like?" not "Ask her what she'd like."

### **People Who Are DeafBlind**

A person who is deafblind has some degree of both hearing and vision loss. People who are deafblind are often accompanied by an intervenor, a professional support person who helps with communication. Intervenors are trained in special sign language that involves touching the hands of the client.

#### **Recommendations**

- Speak directly to your customer, not to the intervenor.
- The customer is likely to explain to you how to communicate with them or give you an assistance card or a note.

### **People With Speech or Language Disabilities**

Cerebral palsy, stroke, hearing loss or other conditions may make it difficult for a person to pronounce words or express themselves. Some people who have severe difficulties may use a communication board or other assistive devices.

If one form or method of communication cannot be used by a person with a disability, they may be able to use another form or method, or a combination. A form of communication could be writing, speaking or the use of pictures. A method of communication could be in person, over the phone or online.

#### **Recommendations**

- Don't assume that a person who has difficulty speaking doesn't understand you.
- Speak directly to the customer and not to their companion or support person.
- Whenever possible, ask questions that can be answered "yes" or "no."
- If the person uses a communication device, take a moment to read visible instructions for communicating with them.
- Be patient. Don't interrupt or finish your customer's sentences.
- Confirm what the person has said by summarizing or repeating what you've understood and allow the person to respond – don't pretend if you're not sure.
- If necessary, provide other ways for the customer to contact you, such as email.

## **People With Learning Disabilities**

The term “learning disabilities” refers to a range of disorders. One example is dyslexia, which affects how a person takes in or retains information. This disability may become apparent when the person has difficulty reading material or understanding the information you are providing.

People with learning disabilities just learn in a different way.

### **Recommendations**

- Be patient and allow extra time if needed. People with some learning disabilities may take a little longer to process information, or to understand and respond.
- Try to provide information in a way that works for our customer. For example, some people with learning disabilities find written words difficult to understand, while others may have problems with numbers and math.
- Be willing to rephrase or explain something again in another way, if needed.

## **People With Developmental Disabilities**

Developmental disabilities (such as Down syndrome) or intellectual disabilities, can mildly or profoundly limit a person’s ability to learn, communicate, do every day physical activities or live independently.

### **Recommendations**

- Don’t make assumptions about what a person can or cannot do.
- Don’t exaggerate your speech or speak in a patronizing way.
- Use plain language.
- Provide one piece of information at a time.
- If you’re not sure of what is being said to you, confirm by summarizing or repeating what was said, or politely ask them to repeat it – don’t pretend if you’re not sure.
- Ask the customer if they would like help reading your material or completing a form, and wait for them to accept the offer of assistance.
- Be patient and allow extra time if needed.

## **People With Mental Health Disabilities**

Mental health disability is a broad term for many disorders that can range in severity. A person with a mental health disability may experience depression or acute mood swings, anxiety due to phobias or panic disorder, or hallucinations. It may affect a person’s ability to think clearly, concentrate or remember things.

You may not know someone has this disability unless you are told. Stigma and lack of understanding are major barriers for people with mental health disabilities.

## Recommendations

- **If you sense or know that a customer has a mental health disability, treat them with the same respect and consideration you have for everyone else.**
- Be confident, calm and reassuring.
- Listen carefully, and work with the customer to meet their needs.
- Respect your customer's personal space.
- Limit distractions that could affect your customer's ability to focus or concentrate – loud noise, crowded areas and interruptions could cause stress.
- Respond to the person's immediate behaviour and needs. Don't be confrontational. If needed, set limits with the person as you would others. For example, "If you scream, I will not be able to talk to you."

## People Who Use Service Animals

### O. Reg. 429/07, s. 4

#### 4. Use of Service Animals

**(1) This section applies if goods or services are provided to members of the public or other third parties at premises owned or operated by the provider of the goods or services and if the public or third parties have access to the premises. O. Reg. 429/07, s. 4 (1).**

**(2) If a person with a disability is accompanied by a guide dog or other service animal, the provider of goods or services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises. O. Reg. 429/07, s. 4 (2).**

**(3) If a service animal is excluded by law from the premises, the provider of goods or services shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the provider's goods or services. O. Reg. 429/07, s. 4 (3).**

There are various types of service animals who support people with various types of disabilities.

- People with vision loss may use a guide dog.
- Hearing alert animals help people with hearing loss.
- Other service animals are trained to alert a person to an oncoming seizure, or to assist people with autism, mental health disabilities, physical disabilities and other disabilities.

Under the Customer Service Standard, there are no restrictions on what type of animal can be used as a service animal.

An animal is considered a service animal if:

- you can easily identify it's a service animal through visual indicators, such as when the animal wears a harness or vest, or
- the person with a disability provides documentation from a regulated health professional that confirms they need the service animal for reasons relating to their disability



## Recommendations

- Don't touch or distract a service animal, it's not a pet. It's a working animal and has to pay attention at all times.
- If you're not sure if the animal is a pet or a service animal, you may ask the customer.
- You may ask to see their documentation from a regulated health professional (\*).
- The customer is responsible for the care and supervision of their service animal. However, you can provide water for the animal if your customer requests it.

### **If another person's health or safety could be seriously impacted by the presence of a service animal, such as a severe allergic reaction**

Consider all options and try to find a solution that meets the needs of both people.

For example:

- creating distance between the two people
- eliminating in-person contact
- changing the time the two receive service
- any other way that would allow the person to use their service animal on the premises

### **If you can't easily identify that it's a service animal**

- Don't make assumptions. You can ask the person to provide documentation (such as a letter, note or form) from a regulated health professional (\*) that states that they require the animal because of their disability.
- If the person shows you the documentation, then they must be allowed to be accompanied by their service animal.
- The person is not required to disclose their disability or demonstrate how the animal assists them.

(\*) Defined as a member of one of the following: College of Audiologists and Speech-Language Pathologists of Ontario; College of Chiropractors of Ontario; College of Nurses of Ontario; College of Occupational Therapists of Ontario; College of Optometrists of Ontario; College of Physicians and Surgeons of Ontario; College of Physiotherapists of Ontario; College of Psychologists of Ontario

### **When a service animal is prohibited by another law**

The law requires you to allow a person to bring their service animal with them into areas of our premises open to the public or to third parties.

Areas are considered open to the public even if they are only open to those people who have paid an admission fee, are members, or have met certain eligibility or entrance requirements. This may include, *for example*, a fitness club, a hotel, taxicab, or a school. In cases where another law prohibits a service animal from entering certain areas (*for example*, a service animal would not be allowed in the kitchen of a cooking school), provide another way for the person to access our services.

N.B. While a service animal may be prohibited from certain areas, service dogs are allowed in areas where food is sold, served or offered for sale. This includes a restaurant's public dining area.



## **Recommendations if the service animal is prohibited by another law**

- Explain why to the customer, and discuss other ways to serve them, for example, leaving the service animal in a safe area where its allowed, and offering assistance to the person while they're separated from the animal, or
- serving the customer in another area where the animal is allowed
- Consider options ahead of time that you could offer when a service animal is prohibited.

## **Recommendations for decision makers – When an animal is prohibited by law**

- Identify if there are any areas of the premises where a service animal would be prohibited by law,
- Any areas identified by the law where an animal is prohibited by law will be updated in this policy accordingly and communicated to our employees
- Options will be considered ahead of time that could be offered to a customer when a service animal is prohibited.

## **People With A Support Person**

### **O. Reg. 429/07 s. 4**

#### **4. Use of A Support Person**

**(4) If a person with a disability is accompanied by a support person, the provider of goods or services shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises. O. Reg. 429/07, s. 4 (4).**

**(5) The provider of goods or services may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises. O. Reg. 429/07, s. 4 (5).**

**(6) If an amount is payable by a person for admission to the premises or in connection with a person's presence at the premises, the provider of goods or services shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person. O. Reg. 429/07, s. 4 (6).**

**(7) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare one or more documents describing its policies, practices and procedures with respect to the matters governed by this section and, upon request, shall give a copy of a document to any person. O. Reg. 429/07, s. 4 (7).**

A support person can be a paid personal support worker, an intervenor, volunteer, family member or friend. A support person might help our customer with communication, mobility, personal care or with accessing our services.

A person with a disability is permitted to bring their support person with them to any area of our premises that is open to the public or to third parties.

If areas being attended charges for admission, such as a movie theatre, it must provide advance notice of what admission fee or fare, if any, will be charged for a support person, for example, through a prominently placed sign or a notice on our website.

### **Recommendations**

- If you're not sure which person is the customer, take your lead from the person using or requesting service, or simply ask.
- Speak directly to the customer, not to their support person.
- If the organization charges an admission fee or fare, be familiar with its policy on fees or fares for support persons.
- It's good practice to confirm with our customer that they want the support person to be present while confidential matters are being discussed.

### **For decision makers – When it may be necessary to require a support person**

In limited situations, it may be required that a person with a disability to be accompanied by a support person for health or safety reasons. You must first consult with the person with a disability and consider available evidence before you determine that:

- a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
- there is no other reasonable way to protect the health or safety of the person with a disability or the health or safety of others on the premises.
- In such a situation, the admission fee or fare must be waived for the support person, if one exists.

### **Recommendations**

- Identify ahead of time if there are situations where a support person might be required to accompany a person with a disability for health or safety reasons, and consider how it will be handled if such situations arise.

### **People Who Use Assistive Devices**

An assistive device is a piece of equipment a person with a disability uses to help with daily living, for example, a wheelchair or walker, cane, hearing aid, an oxygen tank or communication board.

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

We will ensure that our employees are trained and be familiar with various assistive devices that may be used by our customers with disabilities while accessing our goods, services or facilities once the need is identified by our customers.

## **Recommendations**

- Don't touch or handle any assistive device without permission.
- Don't move assistive devices or equipment (such as canes, walkers) out of the person's reach.

Some examples of devices include:

- mobility devices, such as a manual wheelchair or motorized scooter
- lift, which raises or lowers people who use mobility devices
- technology that makes it easier for people with disabilities to communicate or access information, such as certain computer software, an amplification system or a TTY phone line
- adjustable desk or workstation, which changes the height or tilt of a writing surface
- accessible interactive kiosk, which might offer information or services in braille or
- through audio headsets

## **Serving People with Disabilities – At Home or Over the Phone**

### **Recommendations for providing at-home service**

- Don't arrive unexpectedly. Confirm your arrival time in advance.
- Respect requests made by the customer with a disability to accommodate their needs.
- For example, a person with an environmental sensitivity may require that you refrain from wearing scented products in their home.
- Be patient. You may need to wait a few moments for your customer to open the door.
- Introduce yourself. Some customers may not be able to read identification cards and may want you to use a password. Check before your visit.
- Keep your customer informed of what you're doing.
- Make sure that you leave the home exactly as it was when you arrived. For example, someone with vision loss will expect that their furniture is in the same place and could trip if you've moved the sofa.

### **Recommendations for providing over-the-phone service**

- Speak naturally, clearly and directly.
- Don't interrupt or finish the customer's sentences. Give the customer time to explain or respond.
- If you're not sure what is being said to you, politely ask the customer to repeat it, or repeat or rephrase what you heard and ask if you have understood correctly.
- If the customer is using an interpreter or a telephone relay service, speak naturally to the customer, not to the interpreter.
- If you encounter a situation where, after numerous attempts, you and the customer cannot communicate with each other, consider making alternate arrangements that may work best for the customer.

## **Notice of Temporary Disruption**

### **O. Reg. 429/07 , s. 5**

**5. (1) If, in order to obtain, use or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the provider and if there is a temporary**

disruption in those facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 429/07, s. 5 (1).

(2) Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. O. Reg. 429/07, s. 5 (2).

(3) Notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider of goods or services, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 429/07, s. 5 (3).

(4) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare a document that sets out the steps to be taken in connection with a temporary disruption and, upon request, shall give a copy of the document to any person. O. Reg. 429/07, s. 5 (4).

Notice of service disruption shall be provided when facilities or services that people with disabilities usually use to access **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** goods or services are temporarily unavailable or if the goods or services are expected in the near future to be temporarily unavailable, in whole or in part.

The Notice will include the following information:

- The reason for and information about the disruption
- Anticipated duration
- Description of alternative or services, if available
- Contact person

Notice will be given by posting information in a conspicuous place on the premises, on **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** website (if any) or any other such methods as is reasonable in the circumstances.

## **Feedback**     O. Reg. 429/07 s. 7

### **Feedback Process for Providers of Goods or Services**

7. (1) Every provider of goods or services shall establish a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and shall make information about the process readily available to the public. O. Reg. 429/07, s. 7 (1).

(2) The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise. O. Reg. 429/07, s. 7 (2).

(3) The feedback process must specify the actions that the provider of goods or services is required to take if a complaint is received. O. Reg. 429/07, s. 7 (3).

(4) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall prepare a document describing its feedback process and, upon request, shall give a copy of the document to any person. O. Reg. 429/07, s. 7 (4).

**Provincial Industrial Roofing & Sheet Metal Co. Ltd.** shall establish a process for receiving and responding to feedback regarding the manner in which **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** provides goods or services to persons with disabilities and shall make information about the process readily available to the public. The feedback process shall permit persons to provide feedback in person, by telephone, in writing, by email, on-line, on a disk or by any other method. Our feedback process will be responded to in a quick and timely manner to accommodate the request.

### **Notice of Availability of and Format of Documents**

#### **O. Reg. 429/07, s. 8**

**8. (1) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents required by this Regulation are available upon request. O. Reg. 429/07, s. 8 (1).**

**(2) The notice may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 429/07, s. 8 (2).**

**Provincial Industrial Roofing & Sheet Metal Co. Ltd.** shall provide notice that, upon request, it will provide a copy of our policies, and processes required under Ontario Regulation 429/07 Accessibility Standards for Customer Service to any person with a disability in a format that is suitable to the person requesting the documents. i.e.: large print, braille, email, etc.

### **Format of Documents**

#### **O. Reg. 429/07, s. 9**

**9. (1) If a provider of goods or services is required by this Regulation to give a copy of a document to a person with a disability, the provider shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability. O. Reg. 429/07, s. 9 (1).**

**(2) The provider of goods or services and the person with a disability may agree upon the format to be used for the document or information. O. Reg. 429/07, s. 9 (2).**

Should **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** be requested to provide a person with a disability any document noted in this section, **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** will give the person the information contained in the document, in a format that takes into account the person's disability. If a person with a disability asks for a document in a different format, staff will discuss what options are available to the individual and then agree upon the format **Provincial Industrial Roofing & Sheet Metal Co. Ltd.** will provide. i.e.: large print, braille, email, etc.

## **BARRIERS AND SOLUTIONS**

The tables below illustrate the various types of barriers that exist and some possible solutions of their removal.

**Attitudinal barriers** may result in people with disabilities being treated differently than people without disabilities.

<b>Attitudinal Barriers</b>	<b>Possible Solutions</b>
Thinking that people with intellectual disabilities are not able to make decisions	Do not assume what employees or customers with disabilities can or cannot do. Ask them.
Assuming that a person who has a speech impairment cannot understand you.	Train staff to interact and communicate with people with different types of disabilities.
Believing a person who has a mental health disability or someone who uses a wheelchair would not be a good employee.	Learn about ways you can accommodate employees with disabilities.
Assuming that a person with vision loss cannot enjoy movies, TV or concerts.	Learn about the different ways and available technologies that help people with vision loss enjoy movies, TV and concerts.
Avoiding a person with a disability in fear of saying the wrong word or offending them.	Train staff to interact and communicate with people with different types of disabilities.
Thinking that every person with a disability will need costly accommodation.	Learn about the types of accommodations for people with disabilities. Many are low cost.

**Informational and communication barriers** arise when a person with a disability cannot easily receive and/or understand information that is available to others.

<b>Informational and Communication Barriers</b>	<b>Possible Solutions</b>
Print that is too small to read	Make everyday documents, like signs and documents, easy to read by making sure that the print is legible for most people.
Presentation materials for meetings, such as slide decks and videos are not accessible to employees with low vision or who have hearing loss.	Development of a template for slide decks using large fonts, high contrast colours and clean layout. Provide a visual description of the slides when making a presentation.
Include captions for videos. When this is not possible, provide a text transcript of the video.	Provide descriptions or alt tags for pictures for people with vision loss.
Brochures, guides and advertisements are not clear or easily understood.	Use plain language, symbols and pictures to get your message across.
Website pictures do not have descriptions.	Provide descriptions or alt tags for pictures for people with vision loss.
Complicated, busy or confusing signs.	Keep signs clean and clear. Make information available in another form such as a chart or pictogram.

Seating arrangements make it difficult for people who have hearing loss to fully participate in meetings	Arrange seating at a round table to facilitate lip reading. Use assistive listening or implication devices as appropriate.
Marketing and communications are not inclusive, either in depicting people with disabilities, including them as a potential target audience, or in considering them.	Check that your marketing and communications efforts reach people with disabilities. Include people with disabilities of all generations in photos, testimonials and other communications. Ensure marketing collateral such as flyers, brochures, podcasts and YouTube videos, are accessible.

**Technological barriers** occur when technology or the way it is used does not meet the needs of people with disabilities.

Technological Barriers	Possible Solutions
Emails or other electronic communications are not accessible to people who use screen readers.	Make sure every email is accessible to people who use screen readers and offer alternative methods of communication.
Having only one way for customers to reach you, for example, by telephone only.	Allow customers to contact you in variety of ways including telephone, email, TTY or train staff on using the relay service over the phone.
Accepting only online job applications.	Welcome job application in a number of formats.

**Systemic barriers** in policies, practices and procedures and result in people with disabilities being treated differently than others or sometimes excluded altogether.

Systemic Barriers	Possible Solutions
People with disabilities are excluded from events, or included as an after-thought when planning events.	Make sure that accessibility is considered when making plans for events and invite attendees to tell you if they have different needs. Consider using an accessibility checklist for events.
Not knowing about the different types of accommodations an employee might need to return to work after an absence due to a disability.	Learn about the types of accommodations employees might need. Talk with employees about their specific needs is a good first step.
There is no leadership or accountability for issues related to accessibility for people with disabilities.	Designate a point person to implement accessibility policies and procedures.
Hiring policies do not encourage applications from people with disabilities.	Review current hiring processes to identify and remove barriers such as inaccessible locations for interviews.



Procedures may exclude some employees, such as directing maintenance/housekeeping staff to only use certain cleaning products that can cause allergic reactions.	Implement a “fragrance-free” policy.
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**Physical and architectural barriers** in the environment and prevent access for people with disabilities.

<b>Physical/Architectural Barriers</b>	<b>Possible Solutions</b>
Aisles are blocked by displays or merchandise making them too narrow for a person using a wheelchair or walker.	Consider the paths that your employees and customers take when creating displays or storing merchandise.
Event or meeting spaces are inaccessible.	Think about potential barriers when selecting a venue. Do not just look for a ramp. Consider the washrooms, lighting and signage.
Accessibility features such as power-operated doors are broken and not fixed promptly.	Develop a maintenance plan and ensure prompt response times when equipment is broken.

## **ACKNOWLEDGEMENT FORM**

I state that I have attended and received the training for the Accessibility for Ontarians with Disabilities Policy and Process from Provincial Industrial Roofing & Sheet Metal Co. Ltd. I also understand that these processes are not a definitive guide addressing every situation and circumstances, therefore, it is my responsibility to ask for instructions and guidance if not sure how to proceed.

I also understand that if I violate the requirements as stated under Provincial Industrial Roofing & Sheet Metal Co. Ltd.’s Policy and Processes and the Accessibility for Ontarians with Disabilities Act (AODA), and its Regulation, I may face legal, punitive, or corrective action, up to and including termination of employment and/or criminal prosecution.

I further state that I understand these requirements and acknowledge that compliance with these requirements is a condition of my employment. If I violate the requirements or fail to report any violations to these requirements to my supervisor or upper management, I understand that I am subject to disciplinary action up to and including termination, in accordance with company policy,

\_\_\_\_\_  
RECIPIENT SIGNATURE

\_\_\_\_\_  
DATE

\_\_\_\_\_  
COMPANY

\_\_\_\_\_  
MANAGEMENT