

Accessibility Standards for Customer Service with Persons with Disabilities Policy

Accessibility Policies Statement

Cardinal is committed to improving the accessibility needs of people with disabilities and providing equal treatment and opportunity to people with disabilities with respect to accessing services, accommodation and employment in a way that respects their dignity and independence.

Purpose

The *Integrated Accessibility Standards*, Regulation 191/11 ("IASR") under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and the design of public spaces. The *Accessibility Standards for Guest Service*, Regulation 429/07 under the AODA establishes accessibility standards for providing guest service to persons with disabilities. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario *Human Rights Code* (the "Code").

The purpose of these policies is to put in practice our responsibilities under the AODA and to ensure that the Club complies with the Government of Ontario's accessibility standards.

Application

The Club strives to meet the accessibility needs of its employees and the public it serves. As such, the practices and procedures in these Accessibility Policies apply to all Club employees, volunteers and individuals that provide services or interact with people with disabilities on behalf of the Club.

Definitions

Assistive Devices – Auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).

Communication Supports – Supports facilitating effective communications, including captioning, alternative and augmentative communication supports, plain language and sign language.

Disability – As per the Code, means:

- 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 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;
- b) a condition of mental impairment or a developmental disability;
 - c) a learning disability, or a dysfunction in one (1) 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*.

Employees – Every person who deals with members of the public or other third parties on behalf of the Club, whether the person does so as an employee, agent, volunteer or otherwise.

Persons with Disabilities – Individuals who have a disability as defined under the Code (as above).

Service Animals – Animals individually trained to do work or perform tasks for the benefit of a person with a disability.

Support Persons – Any persons, whether a paid professional, volunteer, family member, or friend, who accompany an individual with a disability in order to help with communications, personal care or medical needs, or with access to services.

Guest Service Standards

Reasonable efforts will be made by the Club including its employees, volunteers and individuals providing services on their behalf, to ensure that:

- persons with disabilities are provided equal opportunity to obtain, use and benefit from the Club's services;
- the Club's services are provided in a manner that respects the dignity and independence of persons with disabilities;
- services provided to persons with disabilities are integrated with the services provided to others unless an alternative measure is necessary to allow a person with a disability to benefit from the services;
- communications with a person with a disability are conducted in a respectful manner that takes the person's disability into account;
- persons with disabilities may use assistive devices, service animals and support persons as is necessary to access the Club's offices and services unless superseded by other legislation.

1. Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that all staff, volunteers and others dealing with the public are trained and familiar with various assistive devices that may be used by guests with disabilities while accessing our services.

2. Telephone Services

We are committed to providing fully accessible telephone service to our guests. We will train employees to communicate with guests over the telephone in clear and plain language and to speak clearly and slowly.

All staff, volunteers and others dealing with the public will offer to communicate with guests by web-based guest care request, e-mail or fax if telephone communication is not suitable to their communication needs or is not available.

3. Billing and Invoicing

We are committed to providing accessible invoices to all of our guests. For this reason, invoices will be provided in the following formats upon request: hard copy, e-mail and fax.

All staff, volunteers and others dealing with the public will answer any questions that guests may have about the content of the invoice in person, by telephone or e-mail.

4. Service Animals and Support Persons

We are committed to welcoming people with disabilities who are accompanied by a service animal on parts of our premises that are open to the public and other third parties. All staff, volunteers and others dealing with the public will be properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are also committed to welcoming people with disabilities who are accompanied by a support person on parts of our premises that are open to the public and other third parties. Any person with a disability who is accompanied by a support person will be allowed to enter the Club's premises with his or her support person.

5. Notice of Temporary Service Disruption

The Club will provide guests with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption and its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed in conspicuous places, including entrances and service counters of the affected premises, as well as by other means such as on our website that will ensure that the notice reaches those persons potentially affected by the temporary disruption.

6. Feedback System

The ultimate goal of the Club is to meet and surpass guest expectations while serving guests with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way the Club provides services to people with disabilities can be made in person, by phone, mail, fax and e-mail. If you receive any feedback about our

service to guests with disabilities, or an inquiry as to how to leave feedback, please advise them to contact the Director of Operations either in person, in writing, by telephone or by e-mail using the contact information below.

Upon receipt of any complaints, the Club will investigate the matter with the appropriate personnel and provide a response within 30 days.

Information and Communications

1. Communication

The Club is committed to meeting the communication needs of people with disabilities. We shall notify the public and our employees of the availability of accessible formats and communication supports when requested. Upon request and in consultation with the person making the request, we shall provide, in a timely manner, accessible formats and communication supports for information and communication that takes into account the person's disability. This includes publicly available information about our goods, services and facilities, emergency information and feedback processes.

Where information or communications cannot be provided in an accessible format or with communication supports, for example, if it is not technically feasible, the Club will provide an explanation as to why the information or communication cannot be provided in an accessible format.

2. Emergency Procedures, Plans and Information

The Club will provide, upon request, any existing public emergency procedures, plans and safety information in an accessible format or with appropriate communication supports in a timely manner.

Employment Standards

1. Recruitment

The Club shall post information about the availability of accommodation for job applicants with disabilities in the recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodation is available, upon request. When the applicant requests accommodation, the Club will consult with the applicant to arrange for accommodation in a manner that takes into account the applicant's disability.

2. Employee Supports

The Club will inform its employees of the policies used to support employees with disabilities, including accommodation plans and policies that take into account an employee's accessibility needs. This information will be provided to new employees as soon as practicable after they begin their employment and updated information will be provided to all employees whenever there is a change to existing accommodation policies.

3. Return to Work Program

The Club will maintain a Return to Work Program to support employees in their return to work following absences due to medical injuries and/or disabilities. The Program includes the manner in which the Club will work with the employee and the WSIB (where applicable) to assist the employee in safely returning to work.

4. Accessible Formats and Communication Supports

Upon request by an employee, the Club will consult with the employee 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.

The Club will consult with the employee making the request in determining the suitability of the accessible format or communication supports.

5. Workplace Emergency Response Information

Individual workplace emergency response procedures will be provided to an employee with a disability where it is necessary. In addition, this information will be provided, with the employee's consent, to the person designated to provide assistance. The information will be reviewed whenever the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when the Club reviews its emergency response plans.

6. Performance Management and Career Development and Redeployment

As part of the accommodation process, the Club will take into account the accessibility needs of its employees with disabilities when considering career development, performance management and redeployment.

Training

1. Guest Service Standard

The Club will provide training on the Guest Service Standard requirements under the AODA 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 guest service policies, practices and procedures.

Applicable staff will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. As changes are made to these policies, practices and procedures, the Club will provide on-going training.

2. Integrated Accessibility Standard

The Club is also committed to training employees, volunteers, persons who deal with the public or other third parties on their behalf and other persons involved in developing policies on Ontario's accessibility laws and on accessibility aspects of the Ontario *Human Rights Code* that apply to persons with disabilities.

Training will be provided in a way that best suits the duties of employees, volunteers and other staff members, and will be on-going where there are any changes to these policies. Training will take place as soon as is practicable and upon completion, records of training will be kept and will be available upon request.

Design of Public Spaces

The Club will meet the Accessibility Standards for the Design of Public Spaces when undertaking new construction and redevelopment of public spaces.

Public spaces include:

- outdoor public eating areas
- outdoor play spaces
- outdoor paths of travel (e.g. sidewalks, ramps, stairs)
- accessible parking
- service-related elements (e.g. reception desk)

Modifications to Policy

Any Club policies that do not respect and promote the dignity and independence of people with disabilities will be modified or removed. The Club's policies are maintained and updated regularly to reflect legislative changes and changes in practices.

As we are committed to developing accessibility policies that respect and promote the dignity and independence of people with disabilities, no changes will be made to this policy before considering the impact on people with disabilities.

Further Information

If anyone has a question about these Accessibility Policies or wish to request a copy, please contact:

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