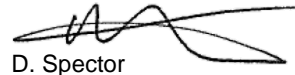




# PROMOTION

HUMAN RESOURCES POLICY & PROCEDURE ACCESSIBILITY POLICY				
Rev. 1	Prepared:    S. Turner HR Administrator	Reviewed:  D. Spector President  D. Das CFO	Approved:   M. Zimny CEO	Date:  2021-Nov-16

Rev.	Date	Description
0	2014-Nov-26	Initial issue.
1	2016-Dec-01	Revision. (Reviewers added/deleted. Accessibility contacts have been updated.)
2	2021-Nov-16	Revision: (Reviewers added/deleted); policy revised to align with recent AODA template recommendations

## OVERVIEW

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is a provincial statute that outlines the requirements and process for developing and enforcing accessibility standards in Ontario.

Accessibility standards are laws that government, businesses, non-profits, and public sector organizations must follow to become more accessible.

The standards are intended to help organizations identify and remove barriers to improve accessibility for people with disabilities in 5 main areas of life, namely:

- Customer service
- Information and communication
- Employment
- Transportation
- Design of public spaces

## DEFINITIONS

For the purpose of this policy:

Term	Definition
AODA	Accessibility for Ontarians with Disability Act, 2005 and its Regulations
Accessibility	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 the benefit from a system, service, product, or environment.
Assistive Device	(Source the Act) – An assistive device is any piece of equipment a person with a disability uses to help them with daily living. Some examples include: a wheelchair, screen reader, listening device or cane.
Accessible Formats	Include but not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.
Barrier	Anything that keeps someone with a disability from participating in all aspects of society. Examples include; physical and architectural barriers, information or communications barriers, technological barriers, attitudinal barriers, systemic barriers
Disability	(Source the Act) –The term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to: <ul style="list-style-type: none"><li>• any degree of physical disability, infirmity, malformation or</li></ul>

	<p>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</p> <ul style="list-style-type: none"> <li>• a condition of mental impairment or a developmental disability</li> <li>• a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language</li> <li>• a mental disorder an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997</li> </ul>
Guide Dog	(Source the Act) – is a highly trained working dog that has been trained to provide mobility, safety and increased independence for people who are blind.
Communication Supports	Include but not limited to captioning, alternative, and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
Service Animal	(Source the Act) –an animal is a service animal for a person with a disability if: <ul style="list-style-type: none"> <li>• it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or</li> <li>• if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.</li> </ul>
Service Dog	(Source the Act) – a dog, other than a guide dog for the blind, is a service dog if: <ul style="list-style-type: none"> <li>• it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or</li> <li>• 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.</li> </ul>
Support Person	(Source the Act) – in relation to a person with a disability, is another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

## 1.0 PURPOSE

Promation's Accessibility Policy identifies Promotion's commitment to accessibility for persons with disabilities and prescribes the methods used to ensure that Promotion follows established principles that support dignity, independence, integration, and equal opportunity for people with disabilities.

## 2.0 SCOPE

This Policy applies to PROMATION, including employees, contract employees, senior management, customers and/or visitors to Promotion. Further, this policy pertains to all services provided by Promotion.

### **PROMATION'S STATEMENT OF COMMITMENT**

PROMATION is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

PROMATION understands that we have a responsibility for ensuring an inclusive environment for all stakeholders. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices.

### **TRAINING**

Promation is committed to training all employees, contractors, and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) All persons who participate in developing the organizations policies; and
- b) All other persons who provide goods, services, or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- How to interact and communicate with people with various types of disabilities
- Our policies related to the Customer Service Standards
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the devices or equipment available on site or otherwise that may help with providing goods, services, or facilities to people with disabilities. These include virtual meetings via MS TEAMS and an on-site wheelchair.
- What to do if a person with a disability is having difficulty in accessing our organization's goods, services, or facilities

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

## **ASSISTIVE DEVICES**

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 ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services, or facilities.

## **COMMUNICATION**

We communicate with people with disabilities in ways that considers their disability.

This may include the following:

- In person communication
- Use of a support person
- Telephone communication
- Email communication
- Text messaging communication

We will work with the person with disabilities to determine what method of communication works for them.

## **SERVICE ANIMALS**

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When we cannot easily identify that an animal is a service animal, our employees may ask for documentation (template, letter, or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- 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
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services, or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services, or facilities

Service animals are prohibited from the following areas:

- Employee kitchen/lunchrooms where there is food preparation for public consumption under Health Protection and Promotion Act and the Food Safety and Quality Act, 2001

## SUPPORT PERSONS

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 certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, PROMATION will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

## NOTICE OF TEMPORARY DISRUPTION

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

The notice will be made publicly available in the following ways: we will place a notice on the entrance doors, website, and if applicable via phone or in person

## FEEDBACK PROCESS

PROMATION welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback can be sent via email, telephone, or in person.

- If by email, please contact: [hr@promation.com](mailto:hr@promation.com)
- If by telephone, please contact the Human Resources Department at: 905-625-6093 x303
- If in person, please request to speak to a member of the Human Resources Team.

If you require an alternative method for providing feedback, please contact the Human Resources Department for further assistance.

All feedback, including complaints, will be directed to the Human Resources Department.

Customers can expect to hear back in **3** business days.

PROMATION ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

## **NOTICE OF AVAILABILITY OF DOCUMENTS**

PROMATION notifies the public that documents related to accessible customer service, are available upon request by posting a notice in the following location:

- Company website

PROMATION will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

## **SELF-SERVICE KIOSKS**

We will consider accessibility for people with disabilities when designing, procuring, or acquiring self-service kiosks.

## **INFORMATION AND COMMUNICATIONS**

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that consider their disability.

When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons

We will consult with the person making the request in determining the suitability of an accessible format or communication support.

If the organization determines that information or communications are unconvertible, the organization shall provide the requester with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications

We notify the public about the availability of accessible formats and communication supports by:



- Website
- Entrance doors

We will also meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

## **EMPLOYMENT**

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request.

We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability.

We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;

- b) when the employee's overall accommodations needs, or plans are reviewed; and
- c) when the employer reviews its general emergency response policies

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

## **DESIGN OF PUBLIC SPACES**

We will meet accessibility laws when building or making major changes to public spaces. Our public spaces include:

- Outdoor public eating areas like rest stops or picnic areas
- Accessible off-street parking
- Accessible on-street parking
- Service-related elements like service counters, fixed queueing lines and waiting areas

We put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

## **CHANGES TO EXISTING POLICIES**

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed.

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

Shannon Turner  
Human Resources Administrator  
By phone: 905-625-6093 ext. 303  
By email: shannon@promation.com  
By mail: 2767 Brighton Rd,  
Oakville, ON L6H 6J4

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