



EFFECTIVE

December 1, 2015

NUMBER

HR-45

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DATED:
December 1, 2015

TITLE

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES

APPLICABLE TO

All Employees who have business dealings with members of the public in Ontario

PURPOSE

To ensure compliance with provincial regulations

RESPONSIBILITY FOR ADMINISTRATION

All Managers

ISSUED TO

All Policy Holders

REQUIRED FORMS

CROSS REFERENCE

SUPERSEDES

HR-45: Accessibility for Ontarians with Disabilities, dated January 1, 2012 and June 16, 2014

Signature:

Title:

Director – Human Resources

Date:

December 1, 2015

Signature:

Title:

President

Date:

December 1, 2015



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POLICY

Troy Life & Fire Safety Ltd. ("Troy") is committed to providing accessible service for its employees, customers and members of the public. Goods and services will be provided in a manner that is based upon the principles of dignity, independence, integration and equal opportunity. The provision of goods and services to persons with disabilities will be integrated wherever possible. Persons with disabilities will benefit from the same services, and in a similar way as other employees, customers and members of the public.

The Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") is a law in Ontario that allows the government to develop, implement and enforce accessibility standards in order to achieve accessibility for Ontarians with disabilities by 2025 with respect to key areas of everyday life.

The Accessibility Standards for Customer Service (Ontario Regulation 429/07) ("ASCS") came into force on January 1, 2008. As a private organization, Troy is required to meet these standards by January 1, 2012.

The Integrated Accessibility Standards (Ontario Regulation 191/11) ("IAS") came into force on July 1, 2011. Defined as a "large organization" in the IAS, Troy is required to meet certain accessibility standards with respect to communications to the public, employment standards and other matters related to accessibility on a staggered timeline.

This policy applies to all persons who deal with members of the public, and others, on behalf of Troy. The requirements set out in this policy and the AODA apply whether the person is considered an employee, a director, a consultant, a student, as well as all persons who participate in developing company policies, practices and procedures governing the provision of accommodation to members of the public. This policy applies to all services offered at buildings and amenities owned, leased or operated by Troy as well as all events hosted by the Troy, regardless of where the event takes place.

Every contract for services in the province of Ontario must include a clause regarding third party compliance with the ASCS policy.

PROCEDURE:

Individual Managers are responsible to assure their services are provided in a manner that is accessible for persons with disabilities.



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Implementation of Customer Service Standards (Regulation 429/07) and Integrated Accessibility Standards (Regulation 191/11)

TRAINING:

Troy provides training about its interaction with, and the provision of its goods and services to, persons with disabilities. All employees who deal with the public or other third parties, and those involved in developing customer service policies, practices, and procedures receive Accessibility Awareness Training. Troy Life & Fire Safety Ltd. will also provide ongoing training with respect to changes in its policies, practices, and procedures to those individuals who require such training as soon as practical. As required by *Ontario Regulation 429/07* and *Ontario Regulation 191/11*, Troy will maintain records of the training provided, including training dates and the number of persons trained.

Employee training includes:

- How to provide information, including emergency and public safety information and employee information, in an accessible format;
- how to provide goods and services in a manner that respects the dignity and independence of persons with disabilities;
- how to interact and communicate with a person with a disability in a manner that takes into account his/her disability;
- the process for people to provide feedback on how we provide goods and services to people with disabilities and how we will respond to any feedback and take action on any complaint;
- how to interact with persons with disabilities who use an alternative device or require the assistance of a guide dog, service animal or a support person to access services or goods;
- how to use equipment or devices on company premises that may help with the provision of goods or services and how to adapt existing service delivery to a person with a disability;
- what to do if a person with a disability is having difficulty accessing goods or services at/from Troy Life & Fire Services Ltd.;
- how to provide emergency response information to employees with disabilities;
- the interaction between the AODA and the Ontario *Human Rights Code*;
- how employees with disabilities will receive workplace accommodation

Who are people with disabilities?

When we think of disabilities, we tend to think of people who use wheelchairs and who have physical disabilities that are visible and obvious. Disabilities can also be invisible. We cannot always tell who has a disability. The AODA uses the same definition of "disability" as the Ontario Human Rights Code.



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What are barriers?

When you think about accessibility, it is important to be aware of both visible and invisible barriers. A barrier is anything that keeps someone with a disability from fully participating in all aspects of society because of their disability.

The customer service standard principles include:

- a) **Independence** – allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
- b) **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 the person to access goods or services.
- c) **Equal opportunity** – people with disabilities have an opportunity equal to that given to others to access your goods or services.
- d) **Dignity** - service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people. People with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience.

ASSISTIVE DEVICES:

An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities such as moving, communicating or lifting. It helps the person to maintain their independence at home, at work and in the community.

If a person with a disability requires assistive devices to access the goods or services of or information provided by Troy they will be allowed to use such devices, as supplied by the person with the disability. In the event that the assistive device is not available, or must be excluded, Troy will provide other measures to enable the person with the disability to obtain, use or benefit from the information, goods or services.

SERVICE ANIMALS:

The customer service standard requires people with disabilities to enter the company property with a service animal, keep the service animal with him/her while at the premises within the parts of company property open to the public or third parties unless the animal is otherwise excluded by law from the premises. If the animal is excluded by law from company property, Troy will provide other measures to enable the person with the disability to obtain, use or benefit from the goods or services.

Under the standard, an animal is a service animal if it is readily apparent that the animal is used by the person for reasons relating to his/her disability, or if the person has a letter from a physician or nurse verifying that the



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animal is required for reasons relating to his/her disability. If it is not obvious that the animal is a service animal, you are not required to allow the animal on company property if the person does not have a letter from a physician or nurse, or an identification card from the Ministry of the Attorney General. A guide dog is a dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Person's Rights Act to act as a guide dog for people who are blind.

SUPPORT PERSONS:

The customer service standard requires people with disabilities to enter the company property accompanied by a support person. Such support person shall be permitted to enter company property with the person with a disability and not be prevented from having access to each other while on the parts of company property that are open to the public or third parties.

A support person is 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. Personal care needs may include, but are not limited to, physically transferring an individual from one location to another or assisting an individual with eating or using the washroom. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.

COMMUNICATION:

The AODA requires people with disabilities to have access to various methods of communication which take into account their disability. The following disabilities may apply:

- a) Vision loss reduces a person's ability to see clearly. Few people with vision loss are totally blind. Many have limited vision such as tunnel vision or a lack of central vision. Some people can see the outline of objects while others can see the direction of light.
- b) Hearing loss may range from being deaf, oral deaf, deafened or hard of hearing. A person who is deaf blind can neither see nor hear to some degree.
- c) Mental health disabilities are not as visible as many other types of disabilities. Examples of mental health disabilities include schizophrenia, depression, phobias, as well as bipolar, anxiety and mood disorders.
- d) Intellectual or developmental disabilities can mildly or profoundly limit the person's ability to learn, communicate, socialize and take care of their everyday needs.
- e) Learning disabilities describes a range of information processing disorders that can affect how a person acquires, organizes, expresses, retains, understands or uses verbal or non-verbal information. Examples include dyslexia, dyscalculia and dysgraphia.
- f) Communication disabilities may be due to cerebral palsy, hearing loss or other conditions may make it difficult to pronounce words or may cause slurring or stuttering.



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Types of assistance that may be used to assist with communication:

- | | |
|---------------------------------------|---|
| Braille | Large print |
| Magnification devices | White cane |
| Guide dog | Hearing aid |
| Paper and pen | Personal amplification device (e.g., Pocket Talker) |
| Scanning or reading technology | Relay Service |
| Phone amplifier | Communication boards |
| Teletypewriter (TTY) | Speech generating device |
| Support person, such as an intervener | Calculator |
| Alternative technology for writing | |
| Tape recorders, mini pocket recorders | |

DISRUPTIONS IN SERVICE:

When a disruption of a particular facility or service occurs that is used to allow a person with a disability to access our information, goods or services, Troy will give notice of the disruption to the public, using the attached form, by posting the reason for the disruption, the anticipated duration of the disruption and describe alternative facilities or services that may be available. This information will be posted in a conspicuous place on company property or by other methods considered reasonable. If the disruption is expected, a reasonable amount of advanced notice of the disruption will be given. If the disruption is unexpected, notice will be provided as soon as possible.

Emergency Response Plan:

The emergency response plan outlines the responsibility and process of identifying persons, including employees, customers and members of the public, who require assistance in the event of an emergency situation and developing a plan to ensure that all persons are able to evacuate a hazardous environment. It is an expectation that all staff involved in assisting persons with disabilities during an emergency response, do so in a safe manner. Staff must also ensure that the environment, equipment, and tools used during the emergency response are safe and in good working condition.

Definitions: Persons requiring assistance: Persons, including employees, customers or members of the public, with a permanent or temporary disability that may affect their ability to evacuate the building safely during an emergency. Examples of conditions that may affect safe evacuations may include, but are not limited to; inability to climb/descend stairs, inability to hear emergency alarms and/or see signs, emergency equipment and evacuations directions.



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Buddy: The staff member assigned during the planning stage, which will assist the person requiring assistance during an evacuation.

- Ensure employees are trained and aware of the general emergency response plan for persons requiring assistance
- Be aware of persons with permanent disabilities and/or those who require temporary assistance to evacuate in the event of an emergency
- Discuss with the person that requires assistance to determine the level of assistance required to evacuate an area in the event of an emergency and determine the need to create an individualized emergency response plan
- Assign a buddy to the person requiring assistance
- Review the individualized emergency response plan when a person moves to a different location within the organization/branch
- Maintain communication with the person
- The employee is to stay with the person requiring assistance until the area has been cleared by the emergency responders in charge of the incident.

FEEDBACK PROCESS:

The AODA requires that organizations that have a process for receiving and responding to feedback must set up this feedback process so that anyone can comment on the provision of information, goods or services to people with disabilities. Information on the process must be readily available to the public. Upon request, Troy Life & Fire Safety Ltd. shall receive and respond to feedback in an accessible format and/or with communication support.

Requests for assistance with providing feedback should be directed to the Human Resources Department at Troy Life & Fire Safety Ltd. by the following methods:

E-mail: HR@troylfs.com
Mail (addressed to): Human Resources
Troy Life & Fire Safety Ltd.
1042 2nd Avenue East
Owen Sound ON N4K 2H7
Phone: 519-371-4747 ext. 2114
In person: Troy Life & Fire Safety Ltd., 1042 2nd Avenue East, Owen Sound, ON



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MODIFICATIONS TO THIS OR OTHER POLICIES:

Any Troy policy that does not respect and promote the dignity and independence of people with disabilities will be modified or removed to be in accordance with The Accessibility Standards for Customer Service (Ontario Regulation 429/07) and the Integrated Accessibility Standards (Ontario Regulation 191/11).

REGULATION REFERENCE:

To view the official wording of the AODA or its Regulations, go to www.e-laws.gov.on.ca, click on "Search" and select "Consolidated Law". Click on "Current" and select results for "Statutes and Regulations". In the search field type "Accessibility for Ontarians with Disabilities Act" and select either "429/07" for the Accessibility Standards for Customer Service, "191/11" for the Integrated Accessibility Standards or "Accessibility for Ontarians with Disabilities Act" for the Act itself. Alternatively, you may contact Service Ontario to order.



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Life & Fire Safety Ltd.

NOTICE OF DISRUPTION OF SERVICE

PLEASE BE ADVISED THAT WE ARE EXPERIENCING A DISRUPTION OF A FACILITY OR SERVICE THAT IS USED TO ALLOW A PERSON WITH A DISABILITY TO ACCESS INFORMATION, GOODS OR SERVICES.

Details of this disruption are as follows:

Facility or Service that is currently disrupted: _____
(e.g. Telephone system)

Reason for the disruption: _____
(e.g. system under repair)

Anticipated duration of the disruption: _____
(e.g. until 9:00 a.m. on XXXX date)

Alternate facilities or services available: _____
(e.g. you may send inquiries by email to xxx@troylfs.com or call (123) 456-7890)