

	<p><u>Human Resources Policies</u></p> <p><b>Accessibility Policy</b></p>
	<p>Category: Ethics and Value</p>
<p><b>Policy Statement</b></p>	<p>PBI strives at all times to provide services and information in a way that respects the dignity and independence of all customers including people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as others.</p>
<p><b>Purpose</b></p>	<p>This policy is intended to provide the overarching framework to guide the review and development of other PBI policies, standards, procedures, and guidelines to comply with the standards developed under the Accessibility for Ontarians with Disabilities Act 2005, S.O. 2005, c. 11. (the AODA).</p>
<p><b>Application</b></p>	<p>This policy applies to all PBI employees, applicants for employment, visitors, and to any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of PBI in accordance with the legislation.</p>
<p><b>Guiding Principles</b></p>	<p>The provision of accessible customer service at PBI will be guided by the fundamental principles governing AODA.</p> <p><b><i>Dignity</i></b></p> <ul style="list-style-type: none"> <li>○ People with disabilities are treated as equally valued and respected as any other individuals.</li> </ul> <p><b><i>Equal Opportunity</i></b></p> <ul style="list-style-type: none"> <li>○ Persons with disabilities have the same opportunities to benefit from the goods and services provided by PBI as other customers. This means taking the individual needs of a person with a disability into account, even if doing so results in different treatment.</li> </ul> <p><b><i>Independence</i></b></p> <ul style="list-style-type: none"> <li>○ People with disabilities are free to choose the manner in which they are served.</li> </ul> <p><b><i>Integration</i></b></p> <ul style="list-style-type: none"> <li>○ People with disabilities have full access to the goods and services provided by PBI. This principle includes the use of alternate measures in cases where full integration does not serve the best needs of a person with a disability.</li> </ul>

## Definitions

### Assistive Device:

- any tool, technology, or equipment that facilitates the performance of everyday tasks by a person with a disability. Examples of assistive devices include, but are not limited to, wheelchairs, walkers, hearing aids, oxygen tanks, and communication boards.

### Disability: As defined in AODA and the *Human Rights Code*, disability includes the following:

- 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,
- a condition of mental impairment or a developmental disability,
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- a mental disorder, or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

### Guide Dog:

- a dog trained as a guide for a blind person that also meets the conditions and qualifications prescribed by *Guide Dogs*, RRO 1990, Reg 58.

### Service Animal:

- any animal accompanying a person with disability, so long as:
- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

	<p><u>Support Person:</u></p> <ul style="list-style-type: none"> <li>○ a person who accompanies a person with disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.</li> </ul>
<p><b>Compliance</b></p>	<p>PBI is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:</p> <p><b>Assistive Devices</b>  Employees, volunteers and third party contractors shall accommodate the use of personal assistive devices to access our goods and services. All staff will be trained on how to assist people using assistive devices.</p> <p><b>Communication</b>  When communicating with a person with a disability, PBI will take into account the person’s disability to ensure accessibility. We will train staff who communicate with customers on how to interact and communicate with people of all abilities. We are committed to accessible services in various means such as email, in person, Bell relay service, 1-800-855-0511. Request for Alternate Format Form will be made accessible at Reception and on the PBI Website and reasonable effort will be made to meet the request.</p> <p><b>Service Animals and Guide Dogs</b>  Employees, volunteers and third party contractors shall accommodate the use of service animals by people with disabilities who are accessing PBI services or goods.</p> <p>Service animals and guide dogs accompanying persons with disabilities are welcome on PBI premises that are open to the public unless the animal is otherwise excluded by law. For example, certain dog breeds may be excluded by the provincial <i>Dog Owners’ Liability Act</i> or by municipal by-laws.</p> <p>Additionally, there may be circumstances where allowing a service animal to accompany a person with a disability on PBI premises might compromise the health and safety of another person. A common example would be allowing a guide dog near a person with a severe allergy to dogs. In such circumstances, PBI will consider all relevant information to come up with a solution that meets the needs of both parties.</p> <p>If it is not apparent that an animal accompanying a person with a disability is a service animal, PBI may require the person to produce a letter from a physician or a nurse to verify the animal’s role.</p>

***Support Persons***

Where a person with a disability accessing PBI goods or services is accompanied by a support person, PBI employees, volunteers and third party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

Generally, the presence of a support person will only be required in situations where there is a significant health and safety risk that cannot be mitigated by other means.

***Notice of Temporary Disruption***

PBI will promptly notify all customers about any disruptions to services or facilities for people with disabilities. This notice will be posted at the reception counter for the outside public and will include information about the reason for the disruption and its anticipated length, as well as information on available alternative services or facilities. The notice will also be placed on website and on central PBI information bulletin board outside the employees' kitchen.

***Establishment of Accessibility Plans and Policies***

PBI has a multi-year Accessibility Plan. The plan is posted on the PBI website and will be made available in an accessible format and with communication supports, upon request.

Progress on the plan will be provided annually. The Accessibility Plan will be reviewed and, if necessary, updated at least once every five (5) years.

PBI maintains policies governing how PBI shall meet its requirements under the AODA, and PBI will provide policies in an accessible format, upon request.

***Accessible Formats and Communication Supports***

Except as otherwise provided by the AODA, PBI shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons, in accordance with the Accessible Formats and Communication Supports Procedures.

This does not apply to products and product labels, unconvertible information or communications and information that PBI does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, PBI shall provide the person requesting the information or communication with:

- an explanation as to why the information or communications are unconvertable;
- a summary of the unconvertable information or communications

### **Employee Training**

**PBI** will train all employees who deal with the public or other third parties on the provision of accessible customer service to people with disabilities, as well as all individuals who participate in the development of policies, practices, and procedures governing customer service.

PBI will keep records on the training provided, including dates training is provided and number of persons trained. Training will be held upon hire and then on an as-needed basis should there be changes in policies, practices and procedures.

Employee training will include the following elements:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005, and the requirements of the customer service standard
- PBI's accessible customer service plan and any updates
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing PBI's goods and services
- The process to provide feedback to PBI about the provision of goods and services for people with disabilities and how we respond and take action on a complaint

### **Recruitment**

PBI shall post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. PBI shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants shall be notified about PBI's policies for accommodating employees with disabilities as part of their offer of employment.

### **Employee Supports**

PBI will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an

employee's accessibility needs due to disability. PBI will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

***Accessible Formats and Communication Supports for Employee***

Upon an employee's request, PBI shall 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.

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

***Workplace Emergency Response Information***

If an employee's disability is such that workplace emergency response information is necessary and PBI is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when PBI reviews its general emergency response plan.

***Documented Individual Accommodation Plans***

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communications supports. If requested, the plans shall include individualized workplace emergency response information.

***Return to Work Process***

PBI shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process shall outline the steps that PBI shall take to facilitate the return to work.

	<p><b>Performance Management and Career Development and Redeployment</b></p> <p>PBI shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.</p> <p><b>Feedback Process</b></p> <p>PBI welcomes customer feedback on our efforts to ensure accessible customer service to people with disabilities.</p> <p>Feedback regarding the way PBI provides good and services to people with disabilities can be made by email, verbally and using the online feedback form. We invite customers to contact the President and HR by email – HR@pbiinc.ca.</p> <p>All customer feedback will be reviewed by the President and HR. Replies will be provided within 5 business days.</p> <p>Additionally, any complaints related to the provision of customer service for people with disabilities can be addressed by making an appointment with the President of PBI.</p> <p><b>Policy Modifications</b></p> <p>PBI will modify or repeal any policy that is inconsistent with the principles set out in AODA or the <i>Accessibility Standards for Customer Service</i>.</p> <p>Any questions about this policy, or if the purpose of this policy is not understood, an explanation will be referred to and provided by a member of the PBI management.</p>
<b>Approvals</b>	Len Larose, Leanna Larose
<b>Date Approved</b>	November 18, 2017
<b>Revised</b>	
<b>Related Links</b>	<p>Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11</p> <p>Accessibility Standards for Customer Service, O. Reg. 429/07</p> <p>Integrated Accessibility Standards, O. Reg. 191/11</p> <p>Human Rights Code, R.S.O. 1990, c. H.19</p> <p>Dog Owners' Liability Act, RSO 1990, c D.16.</p> <p>Guide Dogs, RRO 1990, Reg 58</p> <p>PBI Return to Work - Work Accommodation Procedure</p>
<b>Attachments</b>	<p>Alternate Format Request Form</p> <p>Customer Service Feedback Form</p> <p>Notice of Disruption Form</p>