

HR POLICY		Policy No.	HR-POL-220
		Revision	0
		Date	24/Aug/17
		Owner/Approver	Deanna MacLean

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) POLICY

### Purpose/Scope

Newterra 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. Newterra believes 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 by meeting our accessibility requirements under Ontario's accessibility laws. Whilst this Policy specifically meets the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)* and is not a legal requirement in any other province, the general principles of the policy will be applied across Newterra.

All goods and services provided by Newterra shall follow the principles of dignity, independence, integration and equal opportunity.

### Guidelines

The AODA is an important piece of legislation that requires Newterra to develop and enforce accessibility standards. Newterra is committed to improving accessibility for people with disabilities in the following areas:

1. Customer service
2. Information and Communication
3. Employment

#### 1. Customer Service

It is vitally important that we provide high-quality, accessible services to our clients. The customer service standards under the AODA apply to all Ontario organizations (public, private and non-profit) that provide goods or services directly to the public or to third parties (other businesses, organizations etc.).

Newterra strives at all times to provide goods and services in a way that respects the dignity and independence of persons with disabilities. Persons with disabilities must receive accessible goods and services with the same quality and timeliness as others.

Newterra will comply with the Customer Service Standards, in the following areas:

- **The Provision of Goods and Services to Persons with Disabilities:** every reasonable effort will be made to ensure that policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity.
- **The Use of Assistive Devices:** persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Newterra.
- **The Use of Guide Dogs, Service Animals and Service Dogs:** guide dogs, service animals or service dogs will be allowed access to premises that are open to the public unless otherwise excluded by law.
- **The Use of Support Persons:** both customers with disabilities and their support person will be allowed to enter the premises together and the customer will not be prevented from having access to the support person.
- **Notice of Service Disruptions:** in the event of any disruptions to facilities or services that customers with disabilities rely on to access or use Newterra's goods or services, reasonable efforts will be made to provide advance notice.
- **Customer Feedback:** Newterra shall provide customers with the opportunity to provide feedback on

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the service provided to customers with disabilities.

Customers can submit feedback to:

Dorothy Rawlinson, Manager, Human Resources  
800. 420. 4056 X 1290  
drawlinson@Newterra.com

- **Training:** all staff and volunteers, regardless of the province they are located in, will be trained in Ontario's accessibility laws and aspects of the *Ontario Human Rights Code* that relate to persons with disabilities. We will train our employees and volunteers on accessibility as it relates to their specific roles.
- **Notice of Availability and Format of Required Documents:** customers shall be notified that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the customer's disability.

## **2. Information and Communications**

Everyone has the right to access public information, goods and services. People who use alternate methods of communication, either with human support or technology, may experience communication barriers. Newterra is committed to removing barriers to ensure information and communication is accessible to all employees and clients.

Newterra will provide or arrange for accessible formats and communication supports for persons with disabilities, upon request and where practicable, in a timely manner that accounts for the persons' disability at no additional cost to the person. Newterra will consult with the person making the request, to determine the appropriate accessible format or communication support.

### **Feedback Process**

Newterra will ensure that all feedback processes (both internal and external) are made accessible to clients/customers or employees, upon request. In accordance with customer standards, Newterra will make known the availability of accessible feedback formats.

### **Accessible Formats and Communication Supports**

Unless deemed unconvertable Newterra will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual. Newterra will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Newterra is working towards ensuring our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the AODA and will refer to the legislation for specific compliance deadlines and requirements.

### **Exceptions**

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that Newterra does not control either directly or indirectly through a contractual relationship.

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### **3. Employment**

Policies and procedures which pertain to Human Resources are intended to build an inclusive and accessible work environment free from discrimination and harassment. Likewise, all people are entitled to a workplace that is accessible and enables them to participate fully. Newterra policies are designed to keep the recruitment, retention and development of talent equitable and barrier-free. We uphold the rights of all employees to be treated with dignity, respect and equality. Every employee is expected to contribute to creating and sustaining such a workplace.

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are:

- Establishment of Accessibility Policies and Plans
- Training Requirements
- Records

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

Newterra will develop, implement and maintain policies outlining how it will achieve accessibility through these requirements and will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner. All policies will be made publicly available in an accessible format, upon request. Newterra will establish, implement, maintain and document a multi-year accessibility plan, outlining its strategy to prevent and remove barriers and meet its requirements under the AODA. Accessibility plans will be available in an accessible format, on request and will be posted on the website.

#### **Training Requirements**

Newterra will provide training for its employees and volunteers regarding the AODA and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Newterra policies, and all other persons who provide goods, services or facilities on behalf of Newterra.

Training will be provided as soon as is reasonably practicable, and will be provided on an ongoing basis to new employees and as changes to Newterra's accessibility policies occur.

#### **Records**

Newterra will keep a record of the training provided, when it was provided and the number of employees that were trained.

#### **Workplace Emergency Response Information**

Where required, Newterra will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

#### **Recruitment/Promotion/Performance Management/Career Development**

Throughout the hiring process, Newterra will notify employees, the public and applicants selected to participate in an assessment or selection process of the availability of accommodation for disability. Where an applicant requests an accommodation, Newterra will provide suitable accommodation to the point of undue hardship. When making an offer of employment, we will remind successful applicants of our commitment to accommodating individuals.

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Any decisions or actions relating to redeployment, performance, promotion or career development will take into account the accessibility needs of its employees as well as any individual accommodation plan

### **Accommodation Plans**

Newterra will develop and implement a process for developing documented individual accommodation plans for employees with disabilities. Individualized accommodation plans will be a formal recording of the workplace related accommodations that we provide to employees with a disability. Individualized accommodation plans are living documents that will be reviewed and updated to remain effective and current. We will work with employees who request individual accommodation plans in developing those plans.

### **Return to Work**

Employees who have been absent from work due to disability and who require disability- related accommodations in order to return to work will be accommodated, to the point of undue hardship. The return to work process will be documented and will outline the steps we will take to facilitate the return to work, including a documented individual accommodation plan as part of the process.

### **Definitions**

Disability: the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 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*.

Personal assistive devices: are personal supports used by persons with disabilities that enable them to carry out the activities of daily living. Power-mobility devices (power wheelchairs or scooters) are regarded as personal assistive devices.

Guide Dog – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – an animal is a service animal for a person with a disability if:

1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. the person provides documentation from a regulated health professionals (as specified within the AODA) confirming that the person requires the animal for reasons relating to the disability.

Service Dog – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

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- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- 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.

Support person: someone who accompanies a person with a disability to help with communication, mobility, personal care, medical needs or access to goods or services.

A support person may be a paid professional, volunteer, family member, or friend.

Accessible formats: these are, for instance, large print, recorded audio, electronic formats, braille and other formats for persons with disabilities.

Communication supports: These may include, for instance, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication

Conversion Ready: An electronic or digital format that facilitates conversion into an acceptable format.

### **Policy Review and Revision**

Newterra will review this policy as often as is practicable to reflect changes in our practices or relevant legislation. Newterra reserves the right to modify, suspend, or cancel this policy, at its own discretion, at any time and with immediate effect.

### **History**

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0	24/Aug/17	New Release	D MacLean

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