



AODA

*ACCESSIBILITY FOR
ONTARIANS WITH
DISABILITIES ACT:*

*INTEGRATED ACCESSIBILITY
POLICY*

OVERVIEW

This Integrated Accessibility Policy was created in accordance with Accessibility Standards for Customer Service and the Integrated Accessibility Standards regulatory requirements under the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") for the operations of Freed Developments Ltd. ("Freed").

Freed is committed to providing our services and employment practices in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible to ensure that persons with disabilities will benefit from the same services and employment opportunities, in the same place and in a similar way as other clients, employees and members of the public.

Freed is committed to ensuring that our clients, employees and members of the public receive equitable access and treatment, without unfair discrimination, and receive accommodation where required, in accordance with the provisions of the Human Rights Code and AODA and its Regulations. It is our commitment that, Freed will meet the accessibility needs of persons with disabilities in a timely manner.

This policy applies to all individuals entitled to the protections set out in AODA and its Regulations, including customers, the public and employees of Freed. As legislation changes and develops, Freed will review and amend its policies, practices and procedures, as necessary.

For complete definition of disability, and other definitions, see section "Definitions" on page 10 of this policy.

Starting on page one (1) is an overview of the AODA and information on how to best interact with persons with disabilities. Commencing on page five (5) is an excerpt from Freed's *Employee Policy Manual*. The excerpt includes Freed's various procedures in regards to the AODA.

If at any point further information is required on the AODA please contact;

Human Resources

Telephone: 416-781-5699 Ext 108

E-mail: hr@freeddevelopments.com

AODA & Integrated Accessibility Standards

The Accessibility for Ontarians with Disabilities Act (AODA) became law in 2005. Its goal is to create an accessible Ontario by 2025 by removing barriers in a number of areas. Under the AODA, mandatory accessibility standards are being developed for all organizations and businesses that provide goods or services to the public or to third parties. Accessibility Standards are the rules that all businesses and organizations, including Non-profit organizations, agencies and other charities in Ontario will have to follow in order to identify, remove and prevent barriers to accessibility.

In 2011 the next major piece of legislation to come from the AODA was the Integrated Accessibility Standards, Ontario Regulation 191/11(ASR) in 2011.

These Standards Include:

- Transportation
- Information and Communications
- Employment
- Design of Public Spaces

1. PROVIDING GOODS OR SERVICES TO PERSONS WITH DISABILITIES

One of the standard regulations of The AODA is the Customer Service Standard Regulation. Freed has developed a Customer Service Plan that establishes accessibility standards for customer service for the operations of Freed Developments Ltd. Freed is committed to excellence in providing goods and services to members of the public as well as Freed's customers and their representatives, including persons with disabilities.

2. CUSTOMER SERVICE TO PERSONS WITH DISABILITIES

Freed is committed to providing its goods and services to members of the public as well as Freed's customers and their representatives by removing barriers to accessibility whenever possible, subject to any applicable health and safety requirements. Freed will provide goods or services to members of the public as well as Freed's customers in a manner that respects the dignity and independence of persons with disabilities. Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services provided by Freed.

3. HOW TO INTERACT AND COMMUNICATE WITH PERSONS WITH VARIOUS TYPES OF DISABILITIES

There are many types and degrees of disability. Openly communicating and responding to our customers' needs is the key to excellent customer service for all. If you are not sure about the best approach, just politely ask a person with a disability how you can best communicate with them. Here are a few tips for interacting with people who have various disabilities:

3.1 PEOPLE WITH PHYSICAL DISABILITIES

- If you need to have a lengthy conversation with someone who uses a wheelchair or scooter, consider sitting so you can make eye contact at the same level.
- Don't touch items or equipment such as canes or wheelchairs without permission and if you have permission to move a person's wheelchair, don't leave them in an awkward or dangerous position, such as facing a wall or in the path of opening doors.

3.2 PEOPLE WITH VISION LOSS

- When you know someone has vision loss, don't assume the individual can't see you. Many people who have low vision still have some sight.
- Identify yourself when you approach and speak directly to the person.
- Ask if they would like you to read any printed material out loud to them.
- Offer your elbow to guide them if needed.

3.3 PEOPLE WHO HAVE HEARING LOSS

- Once a customer has identified themselves as having hearing loss, make sure you are in a well-lit area where they can see your face and read your lips if necessary.
- If your customer uses a hearing aid, reduce background noise or move to a quieter area.
- If necessary, ask if another method of communicating would be easier. (i.e. pen and paper)

3.4 PEOPLE WITH SPEECH OR LANGUAGE IMPAIRMENTS

- Don't assume that a person with a speech impairment also has another disability and whenever possible ask questions that can be answered with a "yes" or a "no".
- Be patient and don't interrupt or finish your customer's sentences.

3.5 PEOPLE WHO HAVE LEARNING DISABILITIES

- Be patient – people with some learning disabilities may take a little longer to process information, to understand and to respond.

- Try to provide information in a way that takes into account the customer's ability. For example, some people with learning disabilities find written words difficult to understand.

4. HOW TO INTERACT WITH PEOPLE WHO USE ASSISTIVE DEVICES OR REQUIRE THE ASSISTANCE OF A GUIDE DOG OR OTHER SERVICE ANIMAL

An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities. Personal assistive devices can include things like wheelchairs, hearing aids, white canes or speech amplification devices. You should not touch or handle any assistive device without permission and if you do receive permission you should not move assistive devices or equipment out of your customer's reach.

Under the standard, service animals must be allowed on the parts of our premises that are open to the public. Remember that a service animal is not a pet. It is a working animal. Avoid touching or addressing them.

(Please note that at this time Freed does not have equipment or devices available that may help with the provision of goods or services to a person with a disability.)

5. HOW TO ASSIST PEOPLE WITH DISABILITIES WHO NEED HELP ACCESSING OUR GOODS OR SERVICES

If you notice that a customer is having difficulty accessing our goods or services, a good starting point is to simply ask "How can I help you?" or "How can I best help you?" Our customers are the best source of information about their needs. A solution can be simple and they will likely appreciate your attention and consideration.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT AND INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS

Part 1: Customer Service Philosophy

PROVIDING GOODS OR SERVICES TO PERSONS WITH DISABILITIES

This Customer Service Plan establishes Accessibility Standards for Customer Service under the *Accessibility for Ontarians with Disabilities Act, 2005* for the operations of Freed. Freed is committed to excellence in providing goods and services to members of the public as well as Freed's customers and their representatives, including persons with disabilities.

CUSTOMER SERVICE TO PERSONS WITH DISABILITIES

Freed is committed to providing its goods or services to members of the public as well as Freed's customers and their representatives by removing barriers to accessibility whenever possible, subject to any applicable health and safety requirements. Freed will provide goods or services to members of the public as well as Freed's customers in a manner that respects the dignity and independence of persons with disabilities. Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services provided by Freed.

COMMUNICATION

When communicating with a person with a disability, Freed shall do so in a manner that takes into account the person's disability.

TRAINING FOR STAFF

Freed will provide training to those members of its staff who interact with members of the public or customers on Freed's behalf. Training will also be provided to any person who participates in developing Freed's policies, practices, and procedures governing the provision of goods or services to members of the public or Freed's customers. Freed's training guide will include:

1. An overview of the *Accessibility for Ontarians with Disabilities Act, 2005*, the requirements of the Customer Service Standard Regulation, and Freed's Customer Service Plan.
2. How to interact and communicate with persons with various types of disability.
3. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.

4. How to use equipment or devices available on Freed's premises or otherwise provided by Freed that may help with the provision of goods or services to a person with a disability.
5. What to do if a person with a particular type of disability is having difficulty accessing Freed's goods or services.

This training will be provided to each person as soon as practicable after that person is assigned the applicable duties. This training will be provided on an ongoing basis in connection with changes to the policies, practices, and procedures governing Freed's provision of goods and services to persons with disabilities. Freed shall keep records of the training provided including the dates on which the training is provided and the number of individuals to whom it is provided.

SERVICE ANIMAL

If a person with a disability is accompanied by a guide dog or other service animal, Freed shall ensure that the person is permitted to enter premises owned or operated by Freed to which the customer or the public would have access, with the animal; and to keep the animal with them, unless the animal is otherwise excluded by law from those premises. If a service animal is excluded by law from premises owned or operated by Freed, then Freed shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from Freed's services.

SUPPORT PERSONS

If a person with a disability is accompanied by a support person, Freed shall ensure that both persons are permitted to enter premises owned or operated by Freed, to which the customer or the public would have access, together; and that the person with a disability is not prevented from having access to the support person while on those premises. Freed may require a person with a disability to be accompanied by a support person when on premises owned or operated by Freed, to which the customer or the public would have access, but only if a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on those premises.

NOTICE OF TEMPORARY DISRUPTION

If in order to obtain, use or benefit from the goods or services provided by Freed, persons with disabilities usually use particular facilities or services of Freed at premises owned or operated by Freed and, if there is a temporary disruption in those facilities or services in whole or in part, Freed shall give notice of the disruption to its customers and their representatives as well as to the public.

Notice may be given by posting the information at a conspicuous place on the premises owned or operated by Freed where the disruption occurs, by posting it on Freed's website, or by any other method that is reasonable in the circumstances.

Part 2: Information and Communications Standards

Communication and Feedback Process

Customers and their representatives who wish to provide feedback on the manner in which Freed provides goods or services to persons with disabilities can provide their feedback directly to the Freed representative who is their contact with respect to those goods or services. Alternatively, feedback may be directed to the attention of Freed's Accessibility Coordinator by any of the following methods;

Freed's Accessibility Policy outlining our organizational commitment to accessibility is available to the public on our Freed website and can be obtained in an accessible format, upon request.

Freed encourages members of the public, clients and/or their representatives who wish to provide feedback or request information in an accessible format to contact our Human Resources department directly by any of the following means;

By telephone: 416-781-5699 Ext 108
Email: hr@freeddevelopments.com
Regular mail: Freed Developments Ltd.
552 Wellington Street West, Suite 1500
Toronto, ON, M5V 2V5
Attention: Human Resources

Individuals can expect to receive a response from one of our Freed representatives within three (3) business days. Any concerns with respect to accessibility will be addressed according to Freed's regular complaint management procedures.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORT

Freed, upon request and where possible, will provide information and communication in an accessible format or with appropriate communication supports as soon as practical. When an individual requests an accessible format or communication support, Freed will consult with the person to determine their accessibility needs to determine the most appropriate accessibility format or communication supports, given the needs of the person and the organizations' capability to deliver. Accessible format and/or communication supports will be made available at no greater fee than is commonly charged to the public and/or at no fee if document is commonly available at no cost to the public.

In the event that the format is difficult or impossible to convert into an accessible format, Freed will consult with person requesting the information or communication to determine if it is possible

to provide it in an accessible format or with appropriate communication supports. If deemed impossible to convert, Freed will provide an explanation including description of context to the person requesting the information.

EMERGENCY PROCEDURES, PLAN OR PUBLIC SAFETY INFORMATION

Where emergency procedures, plans and public safety information is made available to the public Freed will ensure such documents are available in an accessible format or with appropriate communication support, as soon as practicable, upon request.

ACCESSIBLE WEBSITES AND WEB CONTENT

Freed will, except where impracticable, ensure that its websites that are accessible to members of the public conform to the applicable requirements of the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 by the dates specified in applicable provincial legislation. We endeavour to take reasonable steps to overcome barriers that people with disabilities might encounter when using our website.

PART 3: Employment Standards

Freed is committed to removing barriers across the employment life cycle to ensure our workplace is accessible and allows for our employees to reach their full potential. A copy of Freed's AODA Integrated Accessibility Policy is posted in the Supply /Copy Room and is saved in ADP-WFN and available to all employees.

RECRUITMENT, ASSESSMENT AND SELECTION

Freed will notify our employees and the public about the availability of accommodation for applicants with disabilities during our recruitment processes. Accommodations will be provided, on request, to support the applicant in all aspects of the recruitment and selection process, including on the job posting, on the invitation to participate in a telephone or in person interview and on the job offer letter.

If an applicant has requested an accommodation, a Freed representative will consult with the applicant and provide or arrange for a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

INFORMING EMPLOYEES OF SUPPORTS

Freed will inform our employees, as soon as practicable, of our policies used to support individuals with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs.

ACCESSIBLE FORMATS & COMMUNICATION SUPPORTS FOR EMPLOYEES

Freed will consult with employees who have requested information, in order to provide them with the accessible format and communication supports they require to do their job effectively and to be informed of information that is generally available to all employees in the workplace.

WORKPLACE EMERGENCY RESPONSE INFORMATION

Freed will provide individual workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and Freed is aware of the need for accommodation due to the employee's disability.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, Freed will provide, as soon as practicable, the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

Freed 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 accommodation need or plan are reviewed; and
- c) When the Freed reviews its general emergency response policies.

DOCUMENTED INDIVIDUAL ACCOMODATION PLANS

Freed will work with employees requiring accommodation to develop an individual accommodation plan which takes into account their individual accessibility needs. Freed will take all necessary steps to protect the privacy of the employee's personal information.

Individual accommodation plans will be reviewed during the annual **Performance Review Process** to ensure it remains relevant and on occasion when the employee has a change in position or takes on additional responsibilities.

RETURN TO WORK PROCESS

Freed will develop and have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work and will document the process.

The return to work process will outline the steps we endeavour to take to facilitate the safe return to work of individuals who were absent as a result of their disability and include their individual accommodation plan.

DEFINITIONS

For the purpose of this Policy, the following terms have the meanings indicated:

AODA defines "**Disability**" as:

- 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 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, 1997*.

"**Service animal**" means, for a person with a disability, an animal if:

- a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- b) the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

"**Support person**" means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

"**Integrated Accessibility Standard Regulation**" establishes accessibility standards and requirements for Information and Communications, Employment, Transportation and Design of Public Spaces and the compliance framework for public, private and not-for-profit organizations.

"**Information**" refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.

“Communications” refers to the interaction between two or more people or entities when information is provided, sent or received.

“Performance Review” refers to activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

“Career Development and Advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or combination of them.