



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) ADMILL GROUP

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Accessibility for Ontarians with Disabilities Act (AODA)

Training Manual

For Employees and Contractors

Under the Accessibility for Ontarians with Disabilities Act (2005), Admill Group is required to train all existing and new employees and contractors and others who are acting on our behalf including those who provide goods, services or facilities on behalf of Admill Group.

This **AODA training booklet** along with the **AODA Customer Service Plan, and the AODA Policy and Multi-Year Accessibility Plan** are available on the Admill Group's websites at:

<https://www.admillgroup.com/home/accessibility>.

Alternative formats of these documents are available upon request.

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AODA Overview

AODA Overview

Purpose and Scope

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is provincial legislation aimed at developing, implementing, and enforcing accessibility standards to ensure accessibility for persons with disabilities across goods, services, facilities, accommodation, employment, buildings, structures, and premises by January 1, 2025.

Admill Group is committed to removing barriers and enhancing accessibility for individuals with disabilities in a manner that respects their dignity, independence, integration, and equal opportunity. We recognize the diverse needs of our clients and the public, striving to provide services and facilities that are fully accessible to all. This policy applies to the management, employees, agents, contractors, third parties, and any other individuals who interact with the public or represent Admill Group in any capacity.

Why is AODA important?

Accessibility means access. It is the ability for everyone, regardless of physical or mental disability, to access, use and benefit from everything within their environment. It refers to the degree to which a product, device, service or environment is available to as many people as possible.

Ontario needs to be more accessible to people with disabilities. We all benefit when everyone has access to places, people and experiences and Ontario benefits daily from the many contributions made by people with disabilities.

Increasing accessibility will help prepare for the future. Our population is getting more diverse and the number of people with disabilities will increase. They will need to travel, shop, use programs, services and information and have access to buildings, parks and other places in a way that is accessible to them. The AODA provides a way for Ontario to become barrier-free.

What are Accessibility Standards?

Accessibility Standards are laws that government, businesses, non-profits & public sector organizations must follow to identify, remove and prevent barriers. The AODA is made up of five standards which fall under a regulation.

Ontario Regulation 191/11 (the “Regulation”)

Customer Service Standard

The standard for Customer Service helps remove barriers for people with disabilities so they can access goods and services. It’s about understanding that people with disabilities may have different needs. It can be as easy as asking “How may I help?” and making small changes to how you serve customers with disabilities.

Information and Communications Standard

The standard for Information and Communications helps Ontario businesses and organizations make their information accessible to people with disabilities.

Employment Standard

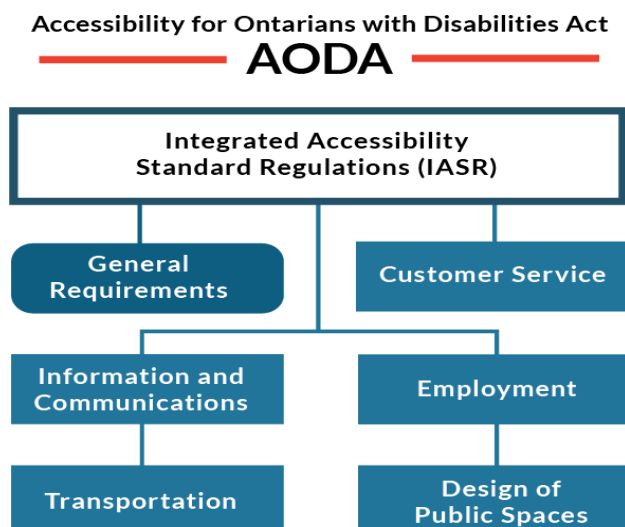
The standard for Employment helps Ontario businesses and organizations make accessibility a regular part of recruiting, hiring and supporting employees with disabilities.

Transportation Standard

The standard for Transportation makes it easier for everyone to travel in the province.

Design of Public Spaces Standard

The standard for Design of Public Spaces makes new construction and redeveloped outdoor public areas accessible.



What does “Disability” mean?

The Ontario Human Rights Code defines disability as:

1. 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
2. A condition of mental impairment or a developmental disability
3. A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
4. A mental disorder
5. An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

What are Barriers?

A barrier is anything that keeps someone from fully participating in all aspects of society because of a disability. Barriers can be both visual and invisible.

TYPES OF BARRIERS	EXAMPLES
<p>Attitudinal barriers are those that discriminate against people with disabilities.</p>	<ul style="list-style-type: none"> • Thinking that people with disabilities are inferior • Assuming that a person who has a speech impairment can't understand you
<p>Systemic/Organizational barriers are an organization's policies, practices or procedures that discriminate against people with disabilities.</p>	<ul style="list-style-type: none"> • A hiring process that is not open to people with disabilities – holding interviews in inaccessible locations
<p>Information & Communications barriers happen when a person can't easily understand information.</p>	<ul style="list-style-type: none"> • Print is too small to read • Websites that can't be accessed by people who are not able to use a mouse • Signs which are not clear or easily understood
<p>Technology barriers occur when a technology can't be modified to support various assistive devices.</p>	<ul style="list-style-type: none"> • A website that doesn't support screen-reading software
<p>Physical and Architectural barriers are features of buildings or spaces that cause problems for people with disabilities.</p>	<ul style="list-style-type: none"> • Hallways and doorways which are too narrow for a person using a wheelchair, electric scooter or walker • Counters which are too high for a person of short stature • Poor lighting for people with low vision • Doorknobs which are difficult for people with arthritis to grasp • Parking spaces which are too narrow for a driver who uses a wheelchair • Telephones that are not equipped with telecommunications devices for people who are deaf, deafened or hard of hearing

The Key Principles of the AODA

Improving accessibility means that more people will have better access to our facilities. People with disabilities come in all ages and backgrounds; disabilities can be noticeable or unnoticeable. There is no specific one way to provide accessibility.

The AODA has four Key Principles that align with Admill Group and Elite Bindery and Mail Solutions Inc. inclusivity goals:

Dignity

Service is provided in a way that allows a person with a disability to maintain self-respect and the respect of others.

Independence

A person with a disability is able to do things on their own without unnecessary help or interference from others.

Integration

A person with a disability should benefit from the same services, in the same place, and in the same or similar way as others, except when alternate measures are necessary to meet the needs of persons with disabilities.

Equal Opportunity

A person with a disability is provided the opportunity to access goods or services, employment and access to the community equal to that given to others.

AODA Mandatory Requirements

For AODA requirements, Admill Group and Elite Bindery and Mail Solutions Inc, is considered a private business with 50+ employees. Our requirements are as follows:

By January 1, 2012 (and on a continuous basis thereafter for new personnel)

- Provide accessible customer service:
 - Establish policies, practices and procedures on providing goods and services to people with disabilities
 - Train all employees/contractors/members of management who serve customers of all abilities and keep records of training
 - Welcome service animals and support persons
 - Establish a process for people to offer feedback on how we provide goods and services to people with disabilities
- Provide accessible emergency and public information when asked; this includes evacuation plans or brochures
- Provide staff with disabilities emergency information when asked in an accessible and customized format

By January 1, 2014

- Create accessibility policies and a multi-year plan:
 - Create policies to help achieve accessibility goals
 - Tell employees and customers about our policies
- Make all websites conform to WCAG 2.0 level A

By January 1, 2015 (and on a continuous basis thereafter for new personnel)

- Train all employees and contractors on the accessibility law requirements (including AODA and the Ontario Human Rights Code) that apply to their job duties and our organization
- Make it easy for people with disabilities to provide feedback

By January 1, 2016

- Provide accessible formats and communication supports, when asked, by working with the person to determine how to meet their needs as soon as possible

- Make our employment practices accessible:
 - Make how we hire, retain and provide career development opportunities accessible
 - Document our processes for developing individual accommodation plans, including WSIB return-to-work plans

By January 1, 2017

- Make new or redeveloped public spaces accessible

By January 1, 2021

- Make all websites conform to WCAG 2.0 level AA

By December 31, 2012/2014/2017/2020/2023

- Document and file accessibility reports with the government

Integrated Accessibility Standards Regulation

Integrated Accessibility Standards Regulation Training

The Integrated Accessibility Standards Regulation (IASR) establishes accessibility standards and introduces requirements for Customer Service, Information and Communications, Employment, Transportation and the Design of Public Spaces. The IASR applies to all public, private and not-for-profit organizations, with at least one employee.

General Requirements of the IASR

The general requirements of the IASR require the Admill Group to:

- Develop an accessibility policy
- Create a multi-year accessibility plan and provide annual status updates
- Provide training and keep a record of the training provided

Accessibility Policy

Admill Group's accessibility policy and supporting procedures outline our commitment to eliminating barriers and improving accessibility.

Multi-year Accessibility Plan

Admill Group's multi-year Accessibility Plan outlines the specific steps we are taking to prevent and remove barriers and comply with current and future requirements of the AODA. The plan will be provided in an accessible format upon request and Elite Bindery and Mail Solutions Inc. will review the plan on a yearly basis to highlight our progress.

Training

Admill Group is committed to provide training on the requirements of the IASR and on the Ontario Human Rights Code to all employees, employees, contractors and other third parties including those who provide goods, services or facilities on behalf of the Company. Admill Group will keep and maintain a record of when training is provided, including dates and the number of individuals trained.

Customer Service Standard

The Customer Service Standard aims at making customer service operations accessible to people with disabilities and there are legal obligations under the standard to which we need to adhere. The standard applies to all people or organizations (public, private and non-profit) that provide goods or services either directly to the public or to other businesses or organizations and have one or more employees in Ontario.

Who Are Our Customers?

A customer is a person who receives goods or services from our organization.

Everyone can benefit from good customer service. Your first question should ALWAYS be, “How may I help you?”

What Kinds of Disabilities Are There?

Disabilities can be both visual and non-visible: while some disabilities are immediately recognizable, others are not.

Assisting People with Disabilities – Introduction

Openly communicating and responding to your customers' needs is the key to excellent customer service for all.

Accessible customer service is about:

- Not making assumptions about what a person can or cannot do because of their disability
- Inclusion – making everyone feel welcome and included
- Understanding that people with disabilities may have different needs

Using Appropriate Language and Terminology

Serving customers with disabilities is also about showing sensitivity and respect. A good starting point is using appropriate language and terminology.

Use the right words

- Use “disability” not “handicapped.”
- Remember to put people first. Say “person with a disability” rather than “disabled person.”
- Reference specific disabilities when appropriate, such as a person with a developmental disability, a person who is blind or has vision loss, or a person who uses a wheelchair.
- Avoid sympathetic phrases such as victim of, suffers with, confined to a wheelchair, physically challenged, or stricken with a particular illness or disability

How to Assist Customers with Different Types of Disabilities

Assisting People with Physical or Mobility Disabilities:

Physical or mobility disabilities include a range of functional limitations from minor difficulties in moving or coordinating one part of the body, through to muscle weakness, tremors and paralysis. Physical disabilities may affect a person's strength and endurance and their ability to perform manual tasks, move independently and control motor movements.

When communicating with someone with a physical or mobility disability:

- Ask before you help. People with disabilities often have their own ways of doing things
- Respect wheelchairs and other mobility devices, as they are part of a person's personal space; no touching, moving or leaning on them
- If you have permission to move a person's wheelchair, don't leave them in an awkward, dangerous or undignified position, such as facing a wall or in the path of opening doors
- Provide information about accessible features of the environment (automatic doors, accessible washrooms, etc.)
- Keep ramps and corridors free of clutter
- Step around high counters to provide service. Have a clipboard handy if filling in forms or providing a signature is required.
- Provide seating for those who cannot stand for long
- Don't touch or move a person's equipment (for example, wheelchair or walker) without permission

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.

Assisting People with Vision Loss

Vision disabilities range from slightly reduced visual acuity to total blindness. Vision loss can result in: difficulty reading or seeing faces; difficulty maneuvering in unfamiliar places; inability to differentiate colours or distances; a narrow field of vision; the need for bright light or contrast; and night blindness.

Vision loss can restrict someone's ability to read documents or signs, locate landmarks or see hazards. Some people may use a guide dog, a white cane, or a support person such as a sighted guide, while others may not.

When communicating with someone with a vision loss:

- Do not assume the person cannot see you – few people with vision loss are totally blind
- Identify yourself when you approach and speak directly to your customer if they are with a companion.
- Offer your arm to guide the person, as necessary, and walk slowly. If they accept, lead – don't pull.
- Do not touch without permission, unless it is an emergency.
- Identify landmarks or other details to orient the person to the surroundings.
- For example, if you're approaching stairs or an obstacle, say so.
- Do not touch, pet or approach service animals at work.
- Offer to read written materials or summarize it.
- If you leave the person let them know when you will return or say goodbye.
- When providing directions or instructions, be precise and descriptive (for example, "two steps in front of you" or "a metre to your left"). Don't say "over there" or point in the direction indicated.
- Don't leave your customer in the middle of a room – guide them to a comfortable location.

Assisting People with Hearing Loss:

People who have hearing loss may identify in different ways. They may be deaf, oral deaf, deafened, or hard of hearing. These terms are used to describe different levels of hearing or the way a person's hearing was diminished or lost.

Hearing loss can cause problems in distinguishing certain frequencies, sounds or words. A person who is deaf, deafened or hard of hearing may be unable to use a public telephone, understand speech in noisy environments or pronounce words clearly enough to be understood. Helpful definitions:

- A person who is deaf has little or no hearing
- Oral deaf is a term describing a person who was born deaf or became deaf before learning to speak but is taught to speak and may not typically use sign language
- The term deafened describes a person who lost their hearing slowly or suddenly in adulthood. The person may use visual clues (captioning, speech reading, computerized not talking, or sign language)
- Hard of hearing describes a person with some hearing and may use hearing aids, other communications devices or sign language.

When communicating with someone who is deaf or hard of hearing:

- Get their attention by a touch on the shoulder or a gentle wave
- Speak clearly and don't shout
- Face the person and keep your hands and other objects away from your face and mouth
- Persons who are deaf may use a sign language interpreter to communicate; always direct your attention to the person who is deaf, not the interpreter.
- For example, say "What would you like?" not "Ask her what she'd like."
- If hearing aids are used, select an area with few competing sounds.
- For example, reduce background noise or if possible, move to a quieter area.
- If necessary, ask if another method of communicating would be easier (for example, using a pen and paper).
- Make sure you are in a well-lit area where your customer can see your face maintain eye contact.
- Use body language, gestures and facial expression to help you communicate.
- Don't assume that the customer knows sign language or reads lips.

Assisting People Who Are Deaf-blind

Deaf-blindness is a combination of vision and hearing loss. Deaf-blindness can interfere with communication, learning, orientation, and mobility. Persons with deaf-blindness may use various sign language systems, Braille, telephone devices, communication boards and often use the services of a support person.

When communicating with someone who is deaf-blind:

- Do not assume what a person can or cannot do.
- Some people who are deaf-blind may have some hearing and/or vision.
- If you are not sure, ask the person what will be helpful.
- Always speak directly to the person, never the support person.
- Identify yourself to the intervenor when you approach your customer who is deaf-blind.
- The customer is likely to explain to you how to communicate with them or give you an assistance card or note.

Assisting People with Speech or Language Disabilities

Speech disabilities involve the partial/total loss of the ability to speak. A person with a speech disability may have issues with pronunciation, pitch/loudness, hoarseness and stuttering/slurring. A person with a language disability has trouble understanding others (receptive language) or sharing thoughts, ideas and feelings (expressive language).

When communicating with someone with a speech or language disability:

- Where possible, communicate in a quiet environment
- Give the person your full attention; do not interrupt or finish their sentences
- Be patient
- Ask them to repeat, as necessary, or write their message
- Ask questions that can be answered 'yes' or 'no'
- Confirm what the person has said by summarizing or repeating what you've understood and allow the person to respond – don't pretend if you're not sure
- Give your customer whatever time they need to get their point across
- If appropriate, offer to move to a more comfortable location
- Don't assume that a person who has difficulty speaking doesn't understand you
- Speak directly to the customer and not to their companion or support person
- If the person uses a communication device, take a moment to read visible instructions for communicating with them
- If necessary, provide other ways for the customer to contact you, such as email

Assisting People with Learning Disabilities

Learning disabilities are disorders that affect verbal and non-verbal information acquisition, retention, understanding, processing, organization and use.

A person with a learning disability may have average or above average intelligence but take in and process information and express knowledge in different ways.

Learning disabilities may result in difficulties with reading/writing, problem solving, time management, wayfinding and processing information.

When communicating with someone with a learning disability:

- Speak clearly and directly to the person
- Respond to any requests for verbal information, assistance in filling in forms, etc. with courtesy
- Be patient and allow extra time if needed. People with some learning disabilities may take a little longer to process information or to understand and respond
- Provide information in a way that works for your customer.
- For example, some people with learning disabilities find written words difficult to understand, while others may have problems with numbers and math
- Be willing to rephrase or explain something again in another way

Assisting People Who Have Intellectual/ Developmental Disabilities

Intellectual and developmental disabilities affect a person's ability to think and reason. It may be caused by genetic factors, exposure to environmental toxins, brain trauma or psychiatric disorders.

A person with intellectual or developmental disability may have difficulty with: understanding spoken and written information, processing conceptual information, perceiving sensory information and storing and retrieving memories.

When communicating with someone with an intellectual or developmental disability:

- Do not assume what a person can or cannot do
- Don't exaggerate your speech or speak in a patronizing way
- Use clear, simple language

Explain and provide examples regarding information. For example, ask the customer if they would like help reading your material or completing a form, and wait for them to accept the offer of assistance.

- Be patient and allow extra time if needed
- Provide one piece of information at a time
- You may want to ask if the information needs to be repeated
- If you're not sure of what is being said to you, confirm by summarizing or repeating what was said, or politely ask them to repeat it – don't pretend if you're not sure

Assisting People with Mental Health Disabilities

Mental health disabilities include a range of disorders. There are three main types of mental health disabilities: anxiety (affects how fearful one perceives places, events, situations), mood (affects how one feels, such as depression or being bipolar) and behavioural (personality issues, which affects how one sees oneself in relation to others).

A person with a mental health disability may seem edgy or irritated, act aggressively, may be perceived as pushy or abrupt, be unable to make a decision or may start laughing or get angry for no apparent reason. A mental health disability may affect a person's ability to think clearly, concentrate or remember things.

You may not know someone has this disability unless you are told. Stigma and lack of understanding are major barriers for people with mental health disabilities.

When communicating with someone you know has a mental health disability

- Treat each person as an individual. Ask what would make him/her the most comfortable and respect his/her needs to the maximum extent possible.
- Try to reduce stress and anxiety in situations
- Stay calm and courteous, even if an individual exhibits unusual behaviour, focus on the service they need and how you can help
- Make an effort to learn about resources available in the community for assisting people with mental health disabilities
- Listen carefully, and work with the customer to meet their needs. For example, acknowledge that you have heard and understood what the person has said or asked
- Respect your customer's personal space
- Limit distractions that could affect your customer's ability to focus or concentrate. For example, loud noise, crowded areas and interruptions could cause stress
- Respond to the person's immediate behaviour and needs. Don't be confrontational. If needed, set limits with the person as you would others. For example, "If you scream, I will not be able to talk to you."

Assisting People with Other/Temporary Disabilities

Other/temporary disabilities are not always visible or easy to distinguish. They may result from a range of conditions, accidents, illnesses and diseases including asthma, diabetes, cancer, environmental sensitivities, seizure disorders, heart disease, stroke and joint replacement. Many people do not think of these conditions as disabilities requiring accessibility considerations but, in some cases, they do.

Assisting Customers with Service Animals

There are various types of service animals who support people with various types of disabilities. A service animal may be a cat or another animal, not just a dog. Service animals are trained to assist a person with disabilities.

To be considered a service animal under the standard, it must be apparent (harness, saddle bag, sign, card that the animal is being used because of a person's disability), if not apparent a letter can be requested from the following health professionals: speech-language pathologists, chiropractors, nurses, occupational therapists, optometrists, physicians and surgeons, physiotherapists, psychologists, registered psychotherapists and registered mental health therapists.

Service animals perform all kinds of tasks

- A guide dog serves as a travel aid for a person with vision loss
- A hearing or signal animal alerts a person with hearing loss when a sound occurs, such as a knock on the door or alarm
- A seizure response animal warns a person of an impending seizure or provides aid during a seizure
- Mobility assistance animals may carry, fetch, activate elevator buttons, ring doorbells, open doors and more

Service animals accompanying persons with disabilities are welcome on Company premises, unless law excludes the animal, such as in an environment where food is being prepared or served such as the kitchen or event spaces.

If the law forbids a service animal, it should be ensured that the person accesses our services with alternate assistance. Explain why to your customer and discuss other ways to serve them, for example:

- Leaving the service animal in a safe area where it's allowed, and offering assistance to the person while they're separated from the animal, or
- Serving the customer in another area where the animal is allowed

When communicating with someone who is accompanied by a service animal:

- Do not pet or talk to the service animal; they are working, and it can distract the animal from its tasks.
- Do not feed or offer treats to the service animal. The customer is responsible for the care and supervision of their service animal. However, you can provide water for the animal if your customer requests it.
- If you're not sure if the animal is a pet or a service animal, ask your customer. You may ask to see their documentation from a regulated health professional.

If another person's health or safety could be seriously impacted by the presence of a service animal, such as a severe allergy, consider all options and try to find a solution that meets the needs of both people. For example:

- Creating distance between the two people
- Eliminating in-person contact
- Changing the time the two receive service
- Any other way that would allow the person to use their service animal on the premises.

If you can't easily identify that it's a service animal:

- Don't make assumptions. You can ask the person to provide documentation (such as a letter, note or form) from a regulated health professional that states that they require the animal because of their disability.
- If the person shows you the documentation, then they must be allowed to be accompanied by their service animal.
- The person is not required to disclose their disability or demonstrate how the animal assists them

Assisting Customers with Support Persons

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 and services. The support person may be a paid personal support worker, a volunteer, a friend or a family member.

The customer service standard requires the Company to allow a person with a disability to be accompanied and assisted by his/her support person while accessing our goods or services. Our policy states that support people are welcome.

When communicating with someone who is accompanied by a support person

- If you're not sure which person is the customer, take your lead from the person using or requesting service, or simply ask.
- Speak directly to the individual and not the support person.
- Plan for the presence of support persons, e.g. ensure seating arrangements accommodate support persons in locations that will help facilitate communication.
- Where possible, provide written materials both to the person with the disability and the support person.
- It's a good practice to confirm with your customer whether they want the support person to be present while confidential matters are being discussed

When it may be necessary to require a support person

In limited situations, you may require a person with a disability to be accompanied by a support person for health or safety reasons. You must first consult with the person with a disability and consider available evidence before you determine that:

- A support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.
- There is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.

Serving Customers Who Use 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, reading or lifting.

Most assistive devices are “personal assistive devices,” such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space.

Commonly used assistive devices:

- For mobility disabilities – wheelchair, walker, cane, scooter, personal oxygen tank
- For the deaf or hard of hearing – FM transmitter system or amplification devices, hearing aid, teletypewriter (TTY), Bell IP Relay, voice carryover
- For vision loss – digital audio player, magnifier, GPS, white cane, guide dog or other service animals
- For intellectual/developmental disabilities – communication boards, speech generating devices
- For learning disabilities – electronic notebook/laptop computer, personal data managers, mini pocket readers

When communicating with someone with personal assistive devices:

- Don't touch or handle any assistive device without permission.
- Don't move assistive devices or equipment (such as canes or walkers) out of the person's reach.

If the Company offers any equipment or devices that can help customers with disabilities access our services, make sure you know how to use them. It may be helpful to have instruction manuals handy or an instruction sheet posted where the device is located or stored.

Some examples of devices that our organization might offer include:

- A lift, which raises or lowers people who use mobility devices.
- Technology that makes it easier for people with disabilities to communicate or access information, such as certain computer software, an amplification system or a TTY phone line.
- Adjustable desk or workstation, which changes the height or tilt of a writing surface

Assisting People with Disabilities – Over the Phone

Tips for providing over-the-phone service

- Speak naturally, clearly and directly
- Focus on what the customer is saying
- Don't interrupt or finish your customer's sentences
- Give your customer time to explain or respond
- If you're not sure what is being said to you, politely ask the customer to repeat what they said, or repeat or rephrase what you heard them say and ask if you have understood correctly.
- If the customer is using an interpreter or a telephone relay service, speak naturally to the customer, not to the interpreter.
- If you encounter a situation where, after numerous attempts, you and your customer cannot communicate with each other, consider making alternate arrangements that may work best for them.

If Customers Have Difficulties Accessing Services or Facilities

If you notice that your customer is having difficulty accessing our services or facilities, a good starting point is to simply ask “**How can I help you?**”

Often, there are simple solutions. For example,

- **Your customer uses a wheelchair and cannot enter your location because of a step at the front door.** You could offer to serve the customer at the door, at another more convenient location, by phone or at their home.
- You might also consider low-cost solutions such as a portable ramp that can be set out at your entrance on request and if suitable to the situation.
- **Your customer with hearing loss has a question.** Ask the customer in writing if using a pen and paper to communicate would be a good way to serve him.
- Remember, if you’re discussing confidential information, offer to return the notes to the customer or to destroy them.
- **Your customer can’t reach some of your products because the displays or shelves are too high to reach from their scooter.**
- Offer to bring the products to the customer.
- **Documents cannot be read by a customer with low vision or a learning disability.**
- Offer to read the document out loud or post the document online so they can access it beforehand.
- **Your customer has a mental health disability that makes it difficult to be in crowded spaces with other people.**
- **They explain their disability-related needs when they enter your reception area.** Offer the customer a place to wait their turn for service in an area apart from other customers.
- **Your organization doesn’t have automatic door openers.**
- Be prepared to help open the door.

Your customers are your best source for information about their needs. Being flexible and open to suggestions will help to create a good customer experience. A solution can be simple and the customer will likely appreciate your attention.

Notice of Temporary Disruptions

Under the Accessibility Standards for Customer Service, the Company must provide notice to the public when facilities or services usually used by people with disabilities to access our services are temporarily unavailable or if they are expected to be temporarily unavailable. This applies to unexpected disruptions, as well as those that you know about ahead of time.

We need to identify the services we offer that people with disabilities rely upon. For example, if any of our locations or workplaces have an elevator or an accessible washroom that has become temporarily unavailable, we must provide notice.

Notice of the disruption will indicate:

- The reason for the disruption
- Its anticipated duration
- The alternative facilities or services available, if any

Notices and communications on service disruptions should be in places where people are likely to find them. For example, notices can be posted on a website, in a window or at a door.

The best practice is to prepare a template in advance and decide where you want to post the notification. You may want specific templates prepared for chronic problems or anything with a regular scheduled maintenance shutdown.








Feedback Process



The Company invites feedback about our accessibility policy and services. Feedback can be made to the Human Resources Department in person, over the telephone at 416-789-0789 ext. 229, in writing and by email hr@admillgroup.com or directly to a workplace office.

All accessibility inquiries and issues are tracked by the Human Resources Department. If you receive feedback at a workplace or satellite office, please forward as per the above contact instructions.

The Universal Symbols of Accessibility

The following are universal symbols of accessibility which are used to promote and publicize accessibility of places, programs and other activities for people with various disabilities.

SYMBOL	DESCRIPTION
	<p>International Symbol of Accessibility (ISA) This is probably the most recognizable symbol of accessibility. The wheelchair symbol should only be used to indicate access for individuals with limited mobility, including wheelchair users. For example, the symbol is used to indicate an accessible entrance, bathroom or that a phone is lowered for wheelchair users.</p>
	<p>Braille Symbol This symbol indicates that printed material is available in Braille, including exhibition labelling, publications and signage.</p>
	<p>Accessible Print The symbol for large print is 'Large Print' printed in 16-20 point font size. In addition to indicating that large print versions of books, pamphlets, guides and programs are available, you may use the symbol on various forms to indicate that print materials may be provided in large print.</p>
	<p>Assistive Listening Systems This symbol is used to indicate that assistive listening systems are available for the event. The systems may include infrared, loop and FM systems.</p>
	<p>Sign Language Interpretation This symbol indicates that Sign Language Interpretation is provided for a lecture, meeting, performance, conference or other program.</p>
	<p>Closed Captioning (CC) This symbol indicates that a television program or videotape is closed captioned for deaf or hard of hearing people (and others).</p>
	<p>Audio Description Blind or low vision people may enjoy television, video and film that offers live commentary or narration (via headphones and a small transmitter) of visual elements provided by a trained Audio Descriptor.</p>

	<p>Telephone Typewriter (TTY)</p> <p>This device is also known as a text telephone (TT), or telecommunications device for the deaf (TDD). TTY indicates the presence of a device used with the telephone for communication with and between deaf, hard of hearing, speech impaired and/or hearing, persons.</p>
	<p>Information</p> <p>This symbol indicates the location for specific information or materials concerning access, such as "LARGE PRINT" materials, audio cassette recordings of materials, etc.</p>

Remember, everyone can benefit from good customer service.



Always ask “How may I help you?”

Information and Communications Standard

The Information and Communications Standard establishes processes that businesses and organizations in Ontario must follow to create, provide and receive information and communications in ways that are accessible to people with disabilities.

The Company is required to provide information and communication in an accessible format (formats that help persons receive and understand information) or with an appropriate communication support (tools to help communication) to persons with disabilities upon request. When a request is received, we will consult with the person to determine their accessibility needs. Accessible formats and communication support must be provided in a timely manner and at no additional cost.

Examples of accessible formats and communication supports:

- Large print documents
- Reading written information directly to a person
- Text transcripts of audio or visual information
- Handwritten notes instead of spoken word
- Information written in clear language
- An electronic document formatted to be accessible for use with a screen reader

How we will provide accessible formats

1. **Ensure Electronic Version is accessible:**
 - Use Microsoft Headings – allows individuals with screen readers to navigate through the document and ensures consistency

2. **Follow Clear Writing Principles:**
 - Use short sentences and avoid unnecessary words
 - Action in your verbs
 - Write as you talk
 - Tie in with reader's experience
 - Write to express, not to impress

3. **Follow Clear Print Guidelines:**
 - Keep text large, between 11 and 18
 - Use **Bold** – with filled boxes
 - Use a sans serif font (e.g. Arial & Verdana)
 - Do not use all CAPS or *italics*
 - Appropriate use of white space
 - Printed materials are most legible in black and white

4. **Colour Contrast:**
 - Use high contrast colours for text and background
 - Do not use colour as your only means of communication
 - Reduce distractions by not using watermarks or complicated background designs

Websites

The Company plans is to achieve Web Content Accessibility Guidelines (WCAG 2.0) Level A and Level AA on all our websites. These guidelines cover things like writing content in plain language, ensuring someone can navigate a website, providing alternate text for images and that documents on a website can be read by a screen reader. The Company's website (updated January 2021) follows AODA requirements.

Feedback

Under the AODA Customer Service Standard, the Company has established a feedback process for receiving and responding to feedback about our accessibility policy and services to persons with disabilities. The public has been advised that our feedback processes can be provided in accessible formats and/or communication support can be provided, upon request.

Emergency Procedures

The Company has incorporated accessibility considerations into its emergency response and evacuation plan and procedures. Upon request, the emergency response plan and public safety information is available in an accessible format or with appropriate communication support.

Examples of emergency information include, but are not limited to:

- Emergency plans and procedures
- Maps, warning signs and evacuation routes
- Information given to the public about alarms or other emergency alerts

Employment Standard

The Company is committed to fair and accessible employment practices that attract and retain talented employees with disabilities. Accessibility will be provided across all stages of the employment life cycle, including recruitment, selection, performance management, career development, redeployment and return to work programs.

Design of Public Spaces Standard

The Design of Public Spaces Standard is to establish a minimum set of requirements to make our public spaces accessible for all Ontarians. Accessibility not only helps people with disabilities, but it also benefits everyone including seniors, families and visitors to Ontario. The standard only applies to new construction of public spaces or major alterations to existing public spaces.

The requirements of the standard are divided into seven sections:

- Recreational trails and beach access routes
- Outdoor public use eating areas, like those found at rest stops or picnic grounds
- Outdoor play spaces
- Exterior paths of travel (sidewalks or walkways) and their associated elements, such as ramps, stairs, curb ramps, rest areas and accessible pedestrian signals
- Accessible off-street and on-street parking spaces
- Obtaining services (service counters, fixed queuing guides and waiting areas)
- Maintenance planning

The Company will ensure that facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.

Transportation Standard

The Transportation Standard sets out the requirements that will prevent and remove barriers to public transportation to make it easier for people to travel within Ontario. The Company will address any concerns with regards to accessibility where applicable under this section of the standards.

Ontario Human Rights Code and the AODA

The Ontario Human Rights Code and the AODA Training

The Ontario Human Rights Code (“the Code”) provides for equal rights and opportunities, and freedom from discrimination. The Code recognizes the dignity and worth of every person in Ontario. It applies to the social areas of employment, housing, facilities and services, contracts, and membership in unions, trade or professional associations.

The Code prohibits discrimination in employment (and other social areas) on grounds of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability.

The Code and the AODA work together in various ways to promote equality and accessibility.

The 4 Key Concepts of “the Code”

- **Primacy** – The Code has power over most Ontario laws (with a few exceptions); this is called “primacy”
- **Remedial** – The Code is remedial – it tries to make a bad situation better, not punish people. Instead, it tries to remove discrimination and prevent it by educating the public and creating awareness.
- **Effect vs. Intent** – The Code looks at what actually happened, not whether someone intended or “meant” to discriminate (effect not intent)
- **Provincial** – The Code covers areas that come under the provincial law

What is Discrimination?

Discrimination is treating someone unfairly by either imposing a burden on them or denying them a privilege, benefit or opportunity enjoyed by others, because of their race, citizenship, family status, disability, sex or other personal characteristics.

Discrimination has many different forms.

- Discrimination can target one person or a group
- It can be hard to see or be part of a system
- It can also be reprisal, a poisoned environment or harassment

People can discriminate directly against one person or group of people. An example is when someone is told they can't have a job because they have a disability.

Direct Discrimination

This means discrimination against someone because you think they are different from you. It includes practices or behaviours that have a negative effect on a person or group of people who belong to a ground listed under the Code. It doesn't matter that you didn't intend to treat them differently. What matters is whether your actions or what you said results in discrimination.

Indirect Discrimination

This is also called constructive discrimination and happens when certain demands or rules seem to be fair but actually keep out some people under grounds listed in the Code or gives some people special treatment over others.

Systemic Discrimination

Discrimination may be part of a system like how decisions are made, and the practices and policies or the culture of the organization. For example, the head of the company likes golf and only wants to promote managers who play golf. Think about who gets invited to the golf game.

Reprisal

Reprisal means punishing someone because they have a human rights complaint, or because they say they have witnessed discrimination. You cannot be punished or threatened with punishment for trying to make a complaint, filing a human rights application, filing a human rights grievance, or acting as a witness at a human rights hearing.

A Poisoned Environment

This is created when comments or actions based on ground listed in the Code make you feel unwelcome or uncomfortable at work. It poisons the workplace. Sometimes all it takes is one comment to poison the environment.

Harassment

Under the Code, Harassment means “engaging in a course of vexatious comment or conduct that is known or ought reasonable to be known to be unwelcome.”

Harassment usually meets the following requirements: What was said or the behaviour usually happened more than once. The person responsible for the comment or conduct should have known that it is not welcome.

Racial Profiling

Racial profiling happens when you act because you're worried about safety, for security reasons, or for the public's protection and your decision is based on stereotypes about a person's race, colour, ethnicity, ancestry, religion or place of origin.

All are entitled to a discrimination free work environment based on the human rights grounds named above.

The Duty to Accommodate

In the workplace all are entitled to be accommodated based on the Codes grounds of discrimination, this includes individuals with disabilities. Even when facilities and services are designed as inclusively as possible, we may still need to accommodate the individual needs of some persons with disabilities.

Under the Code, the Company has a legal “duty to accommodate” persons with disabilities. The goal of accommodation is to allow persons with disabilities to benefit equally and take part fully in the workplace, housing and other services.

There is no set formula for accommodating people with disabilities. Individual needs must be considered each time a person asks to be accommodated. A solution for one person may not work for someone else. Accommodation should be a shared responsibility, working with the person asking for accommodation, exchanging relevant information and looking for accommodation solutions together.

Examples of accommodation include:

- Supplying reading materials in alternate formats
- Offering flexible work hours or break times
- Providing sign language interpreters or real-time captioning
- Modifying job duties, retraining or offering alternative work
- Putting in automatic entry doors and making washrooms accessible when renovating the workplace

A lot of accommodation can be made easily and at a reasonable cost. In some cases, putting the best solution in place right away may result in “undue hardship” for the Company because of costs or health and safety factors.

Undue hardship is the legal limit of the duty to accommodate. It refers to situations where severe negative effects outweigh the benefit of providing accommodation. Even if undue hardship occurs, the Company still has the duty to take the next-best steps that would not result in undue hardship. Such steps should be taken only until more ideal solutions can be put in place or phased in.

Accommodation Duties and Responsibilities

Workers and managers all have duties and responsibilities during accommodation.

Workers/a person with a disability:

- Tell your employer what your needs are related to your disability and job duties
- Provide supporting information about your disability-related needs, including medical or other expert opinions, where needed
- Take part in seeking accommodation solutions

Management:

- Accept requests for accommodation in good faith.
- Deal with accommodation requests promptly, even if it means creating a temporary solution while developing a long-term one.
- Ask only for information that is needed to provide accommodation.
- For example, it is needed to know that a worker's loss of vision prevents them from using printed material, but not how or why they lost their vision.
- Take an active role in seeking accommodation solutions that meet individual needs and ask for expert help if needed.
- Respect the dignity of the person asking for accommodation and keep information confidential.
- Cover the cost of accommodation, including any needed medical or other expert opinions or documents, to the point of undue hardship.

Applying Human Rights Principles

All organizations should follow human rights principles and Code obligations when implementing the AODA standards.

Some points to keep in mind:

- Don't create new barriers: No changes should be made to facilities, services, goods, technology, or procedures that reinforce or create new barriers.
- Design inclusively: Make choices that work for as many people as possible, especially those with disabilities, while meeting individual needs.
- Favour integration over segregation: Usually the best accommodations allow people with disabilities to participate in similar ways with everyone else.
- Equal outcomes sometimes require different treatment: Different or separate accommodations may be necessary to help people do their jobs or access services.
- Involve those who need accommodations in exploring solutions: They often know what works best for them.
- Make sure the process and solutions meet the individuals' needs and promote privacy, dignity and respect.
- Spread out accessibility costs so that persons with disabilities do not face extra costs for accommodation.
- Accessibility should be factored in as part of the overall cost of doing business.

The Code and AODA accessibility standards are laws that work together to promote equality and accessibility in Ontario. Under the Code, managers must consider disability-related accommodation requests and provide timely accommodation from recruiting and hiring through to retirement or dismissal.

Compliance and Enforcement

Understanding and applying human rights principles may help avoid potential human rights complaints and litigation.

The 3 Human Rights Systems

Ontario has 3 organizations in the human rights system, they are:

- **Ontario Human Rights Commission** – provides policies, guidelines and other information on CODE grounds, including disability and the duty to accommodate.
- **Human Rights Tribunal of Ontario** – hears discrimination claims (called applications) on any Code ground. This includes failure to accommodate disability- related needs
- **Human Rights Legal Support Centre** – helps people through the human rights process, such as completing an application to the Tribunal

Individuals cannot file accessibility complaints under the AODA. But in cases of non- compliance, the Directorate can enforce standards through mechanisms set under the law. The Accessibility Directorate works with organizations to help them achieve compliance.

The Code in Summary

- The Code and the AODA are laws that work together
- The Code protects every person's right to equal opportunities and to be free from discrimination
- The Code has primacy, which means that Ontario laws have to follow the Code
- The Code states there is a legal duty to accommodate persons with disabilities. Accommodation is to the point of undue hardship
- AODA accessibility standards complement the Code to promote equality and accessibility in Ontario
- The AODA uses the same definition of disability as the Code; if the two conflict, then the Code prevails

Questions and Concerns

If employees have any questions or concerns about this policy or how AODA compliance is determined, they are encouraged to contact their immediate supervisor or the Human Resources department.

We encourage feedback from the public regarding the provision of accessible services. Feedback will be used to identify areas for improvement and to enhance service delivery. All feedback will be kept confidential, with responses provided when appropriate. Feedback can be submitted in person, by phone, or by email.

How to contact Human Resources Representative:

By email: hr@admillgroup.com

By phone: 416-789-0789 ext. 229

Please note that this email account is monitored frequently, and any concerns or complaints will be responded to within 1-10 business days depending on the severity and nature of the situation.

Resources

The following resources served as the foundational guidelines in the development of Admill Group's Accessibility for Ontarians with Disabilities Act, AODA policy and training booklet:

Accessibility in Ontario - <http://www.ontario.ca/accessibility>

AccessForward - <http://www.accessforward.ca/>

Ontario Human Rights Commission - <http://www.ohrc.on.ca/>

Online Public e-Learning Resources Available

The following are additional training resources available in an e-Learning platform:

Accessibility for Ontarians with Disabilities Act: Free AODA Online Training <https://www.aoda.ca/free-online-training/>

AccessForward: Training for an Accessible Ontario
<http://www.accessforward.ca/>

OHRC Working Together: The Code and the AODA
<http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda>

Admill Group
Human Resources
1860 Midland Avenue,
Scarborough, ON M1P 3C2

Email: hr@admillgroup.com

Phone: 416-789-0789 ext. 229

Acknowledgement Form for the following policies

- Accessibility for Ontarians with Disabilities Act, AODA

I, the undersigned, hereby acknowledge that I have received, read, and understand the company's **Accessibility for Ontarians with Disabilities Act, AODA**.

I acknowledge that it is my responsibility to report any concerns or issues related to **Accessibility for Ontarians with Disabilities Act, AODA** to my supervisor.

I further acknowledge that I have been provided with the necessary training and resources to understand and comply with the **above-mentioned policies**.

Employee Name (Printed): _____

Employee Signature: _____

Date: _____

Supervisor Name (Printed): _____

Supervisor Signature: _____

Date: _____