



ACCESSIBILITY INFORMATION



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Accessibility Policy

Introduction

Kaitlin Corporation (the “Company”) is committed to providing an environment free of discrimination and harassment, in which all individuals are treated with respect and dignity and are able to contribute fully and have equal opportunities. ***The Accessibility for Ontarians with Disabilities Act (“AODA”)*** is a law that sets out a process for developing and enforcing accessibility standards for people with disabilities. Accessibility standards are laws that govern businesses, non-profits and public sector organizations to become more accessible.

Applicability

The right to freedom from discrimination and harassment extends to all employees including full time, part time, temporary, contract staff, volunteers, contractors, and others who provide services on behalf of the Company. This policy applies to every level of the organization and to every aspect of the workplace environment and employment relationship. This policy is intended to meet the requirements of ***The Integrated Accessibility Standards, Ontario Regulation 191/11 (“O.Reg 191/11”)***.

Responsibility

Employees shall, at the earliest opportunity, advise of any change in their circumstances that may require the Company to consider or take into account of an employee’s needs connected to or related to their disability.

Support for Employees

Where an employee requests accommodations for disabilities, the Company will consult with the employee about the provision of accessible formats and communication supports that may be needed in order for the employee to perform their job. The Company shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.

Performance Management

The Company uses performance management in respect of its employees and shall take into account the accessibility needs of employees with disabilities, when using its performance management process in respect of employees with disabilities.

Return to Work

Where an employee has been absent from work due to ill health or sickness that is related to or connected with their disability, the Company shall develop and have in place a return to work process. Such a process shall be documented and shall identify the steps that the Company shall take to facilitate the return to work of employees who were absent because of their disability.

Review

The Company will periodically review this policy carrying out any necessary amendments in the light of changes in legislation or improving good practice and supervising its implementation.

Accessibility Standards for Customer Service

General

The Company's Accessibility Standards for Customer Service policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07 ("O.Reg 429/07")* under the *Accessibility for Ontarians with Disabilities Act, 2005 ("AODA")*, and applies to the provision of goods and services to the public other than third parties, not to the goods themselves.

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

Definitions

Assistive Device

An assistive device is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal aid devices are typically devices that customers bring with them such as a wheelchair, walker, or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability

The term 'disability' is defined by AODA, and *the Ontario Human Rights Code ("OHRC")*, 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, or any degree of paralysis, amputation, lack of physical co-ordination, blindness, or a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder;
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997 ("WSIB")*.

Accessibility Information

Guide Dog

A 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

A service animal is an animal for a person with a disability if:

- It is readily apparent to an average person that the animal functions as a service animal for a person with a medical disability, or;
- The person who requires the animal can provide on request a letter from a physician or nurse confirming that the person requires a service animal.

Support Person

A support person means, in relation to a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care, medical needs or access to goods and services.

Guidelines

In accordance with the O.Reg 429/07, this policy addresses the following:

1. The Provisions of Goods and Services to Persons with Disabilities
2. The Use of Assistive Devices
3. The Use of Guide Dogs, Service Animals, and Service Dogs
4. The Use of Support Persons
5. Notice of Service Disruptions
6. Customer Feedback
7. Training
8. Notice of Availability and Format of Required Documentation

Accessibility Information

The Provisions of Goods and Services to Persons with Disabilities

The Company will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integrity, and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods, when possible, to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Considering individual needs when providing goods and services and;
- Communicating in a manner that considers the customers disability.

The Use of Assistive Devices

Customers Own Assisted Device(s)

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the Company. Company staff will not touch or otherwise interfere with a person's assistive device. In cases where assistive devices present a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customers in a location that would be considered safe for both the customer and business. Or, where the elevators are not present and where an individual requires assistive devices for the purpose of mobility, service will be provided in a location that meets the needs of the customer.

The Use of Guide Dogs and Service Animals

A customer with a disability that is accompanied by a guide dog, or service animal, will be allowed access to premises that are open to the public unless otherwise excluded by law. 'No Pet' policies do not apply to guide dogs or service animals.

Exclusion Guidelines

If a guide dog or service animal is excluded by law (see applicable laws below), the Company will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of employees).

Accessibility Information

Recognizing a Guide Dog and/or Service Animal

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, the Company may request verification from the customer. Verification may include:

- A letter from a physician or nurse confirming that the person requires the animals for reasons related to the disability;
- A valid identification card signed by the Attorney General of Canada, or;
- A certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal

The customer that is accompanied by a guide dog, or service animal is responsible for always maintaining care and control of the animal.

Allergies

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, the Company will make all reasonable efforts to meet the needs of all individuals.

The Use of a Support Persons

If a customer with a disability is accompanied by a support person, the Company will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, the Company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Admission Fees

The Company does not typically charge admission fees- In the rare event that a payment is required by a support person for the premises, the Company will ensure that notice is given in advance by posting notice of admission fees for support persons where the Company fees are posted.

Accessibility Information

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Company. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the Company's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications Will Include

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration; and
- A description of alternate services or options.

When disruptions occur, the Company will provide notice by:

- Posting notices in conspicuous places including at the point of disruption, at the main entrance, and the nearest accessible entrance to the service disruption and/or on the Company's website, if the Company has a website;
- Contacting customers with appointments;
- Verbally notifying customers when they are making a reservation or appointment, or;
- By any other method that may be reasonable under the circumstances.

Customer Feedback

The Company recognizes the importance of feedback to identify the barriers to accessibility and continue to improve our services and policies. The Company shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available at initial meetings and on the Company website. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (handwritten, delivered, website or email), will be available upon request. Feedback information is available at the end of this document. **Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.**

Training

Training will be provided to:

- All employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company
- Those who are involved in the development and approval of customer service policies, practices, and procedures.

Training Provisions

As reflected in O.Reg 429/07, regardless of the format, training will cover the following:

- A review of the purpose of the AODA.
- A review of the requirements of the O.Reg 429/07.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who: Use assistive devices; Require the assistance of a guide dog, service dog, or other service animal, or; Require the use of a support person (including the handling of admission fees)
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- The Company's policies, procedures, and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

The Company will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf during orientation. Revised training will be provided in the event of changes to legislation, procedures, or practices.

Record of Training

The Company will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents

The Company shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in the format that takes into account the customers disability. Notification will be given by posting the information in a conspicuous place owned and operated by the Company, the Company's website, if one is available, and/or any other reasonable method.

Policy Review

This policy and its related procedures will be reviewed yearly, or as required if more frequent, in the event of legislative changes or changes to the Company procedures.

Accessible Customer Service Policy

Purpose

To provide the Company employees with information and training on how to provide accessible customer service for people with disabilities.

To provide our customers and vendors information about the Company policies regarding accessible customer service.

Background

The Company is committed to excellence in serving all customers, including people with disabilities.

In accordance with the ***Accessibility Standards for Customer Service, Ontario Regulation 165/16 (“O.Reg 165/16”)***, this policy sets out the standards by which the Company will provide goods and services to individuals with disabilities.

The Company shall, upon request, supply a copy of the policies, practices, and procedures to any person.

Definitions

- Assistive Devices – any auxiliary aid such as communication aids, cognition aids, personal mobility aids and medical aids (i.e., canes, crutches, wheelchairs, or hearing aids).
- Disabilities – a broad range and degree of conditions, some visible and others not. A disability may have been present from birth, caused by an accident, or developed over time. It includes physical, mental, and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, drug and alcohol, dependencies, environmental sensitivities, as well as other conditions (per OHRC).
- Employees – any person who deals with members of the public or other third parties on behalf of the Company, whether the person does so as an employee, agent, volunteer or otherwise.
- Persons with disabilities – individually trained to do work or perform tasks for the benefit of a person with a disability.
- Service Animals – any animal individually trained to do work or perform tasks for the benefit of a person with a disability.
- Support Persons – any person whether a paid professional, volunteer, family member or a friend that accompanies a person with a disability in order to help with communications, personal care or medical needs, or with access to goods or services.

Accessibility Information

Policy

Training For Staff

The Company will provide training to employees, volunteers, and others who deal with the public or other third parties on their behalf.

This training will be provided to new staff within 30 days of their start date. Staff will also be trained when changes are made to the plan.

Training will include:

- An overview of the **AODA** and the requirements of the customer service standard.
- The Company's plan related to the customer service standard.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use an assistive device, or require the assistance of a service animal, or a support person.
- How to use the assistive devices available on-site that may help with providing goods or services to people with disabilities.
- What to do if a person with a disability is having difficulty accessing the Company's goods and services.

Assistive Devices

We will ensure that our staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods and services.

Communication

We will communicate with people with disabilities in ways that take into account their disability.

Service Animals

We welcome people with disabilities and their service animals. People with disabilities may bring their service animals on the parts of our premises that are open to the public or other third parties.

Accessibility Information

Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

Notice of Temporary Disruptions

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the Company will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Feedback Process

Customers who wish to provide feedback on the way the Company provides goods and services to people with disabilities can provide feedback through several methods located at the end page of this document.

All feedback will be directed to the Company's HR. Where requested, customers can expect to hear back within five business days. Where possible, complaints will be addressed within the specified time period. However, some complaints may require more effort to address, and may be reviewed at a higher level. In such cases, customers will receive acknowledgement in the requested method within five business days, and feedback within 15 business days.

Alternative Formats

Customers that require documents provided in alternative formats should notify the staff member they are dealing with, or can contact the Company's Human Resources using any of the information listed below.

The Company will make a reasonable attempt to provide the document in the requested format. If the requested format is not available, staff will work with the customer to determine an appropriate solution.

Modifications to This or Other Policies

Any policy of the Company that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Accessible Customer Service – Best Practice and Procedures

Acceptable Terms When Talking About Disabilities

The following is an excerpt from the **Ministry of Community and Social Services**:

Words can influence and reinforce the public's perception of people with disabilities. They can create either a positive view of people with disabilities, or an indifferent and negative depiction.

Here are some general tips that can help make your communication and interactions with or about people with all types of disabilities more successful:

- Use disability or disabled, not handicap or handicapped
- Never use the term retarded, dumb, psycho, moron, crippled, or any other inappropriate terms/language. These words are demeaning and disrespectful.
- Remember to put people first. It is proper to say 'person with a disability' over 'disabled person'.
- If you do not know someone or are not familiar with the disability, it is better to wait until the individual describes their situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics, and your assumptions may be wrong.

Best Practices and Procedures

Accessible customer service follows four basic principles:

- Dignity
- Independence
- Integration
- Equal Opportunity

What can I do to help people with disabilities access our services?

- Ask how you can help;
- Offer a variety of methods of communication;
- Understand the nature and scope of the service you offer.

Providing Customer Service to People with Disabilities

Physical Disabilities

Physical disabilities include a range of functional limitations from minor difficulties in moving or coordinating one part of the body, through muscle weakness, tremors, and paralysis. Physical disabilities can be congenital, or acquired, such as tendonitis. A physical disability may affect an individual's ability to:

- Perform manual tasks such as holding a pen, turning a key or gripping a doorknob;
- Move around independently;
- Control the speed or co-ordination of movements;
- Reach, pull, or manipulate objects;
- Have strength or endurance.

There are many types and degrees of physical disabilities, and not all require a wheelchair. It may be difficult to identify a person with a physical disability.

- Speak normally to your customer. Do not speak to someone who is with them;
- People with physical disabilities often have their own way of doing things. **Ask before you help;**
- Wheelchairs and other mobility devices are part of a person's personal space. **Do not touch, move, or lean on them;**
- Provide your customer with information about accessible features of the immediate environment (automatic doors, accessible washrooms, etc.);
- Keep ramps and corridors free and clear of clutter;
- If a counter is too high or wide, step around it to provide service;
- Provide seating for those who cannot stand in line;
- Be patient. Customers will identify their needs to you.

Hearing Disabilities

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 a noisy environment;
- Pronounce words clearly enough to be understood by strangers.

Accessibility Information

Like other disabilities, hearing loss has a wide variety of degrees. Remember, customers who are deaf or hard of hearing may require assistive devices when communicating.

- Attract the customer's attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand;
- Always ask how you can help. Do not shout, speak clearly;
- Be clear and precise when giving directions and repeat or rephrase if necessary. Make sure you have been understood;
- Face the person and keep your hands and other objects away from your face and mouth;
- Deaf people may use a sign language interpreter to communicate- always direct your attention to the deaf person, not the interpreter;
- Any personal (e.g., financial matters) should be discussed in a private room to avoid other people overhearing;
- If necessary, write notes back and forth to share information
- Do not touch service animals- they are working and have to pay attention at all times.

Deaf-Blindness Disabilities

Deaf-blindness is a combination of hearing and vision loss. The result for a person who is deaf-blind is significant difficulty accessing information and performing daily activities. Deaf-blindness interferes with communicating, learning, orientation, and mobility. People who are deaf-blind communicate using various sign language systems, braille, telephone devices, communication boards and any combination thereof.

Many people who are deaf-blind use the services of an Intervener who relay information and facilitate auditory and visual information and act as sighted guides.

Most people who are deaf-blind will be accompanied by an intervener, a professional who helps with communicating.

Interveners are trained in special sign language that involves touching the hands of the client in a two-hand, manual alphabet or finer spelling, and may guide and interpret for their client.

- Do not assume what a person can or cannot do. Some people who are deaf-blind have some hearing or sight, while others have none;
- A customer who is deaf-blind is likely to explain to you how to communicate with them or give you an assistance card explaining how to communicate with them;
- Do not touch or address service animals- they are always working;
- Never touch a person who is deaf-blind suddenly or without permission unless it is an emergency.
- Understand that communication can take some time- be patient;
- Direct your attention to your customer, not the intervener.

Accessibility Information

Vision Disabilities

Vision disabilities reduce one's ability to see clearly. Very few people are totally blind; many have limited vision such as tunnel vision, where a person has a loss of peripheral or side vision, or a lack of central vision, which means they cannot see straight ahead. Some can see the outline of objects while others can see direction of light.

Vision loss may 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
- Night blindness

Vision disabilities may restrict your customer's ability to read signs, locate landmarks, or see hazards. In some cases, it may be difficult to tell if a person has a vision disability, while others may use a guide dog or white cane.

- Verbally identify yourself before making physical contact;
- If the person uses a service animal – do not touch or approach the animal – it is working;
- Verbally describe the setting, form, location as necessary;
- Offer your arm to guide the person. Do not grab or pull;
- Never touch your customer without asking permission, unless it is an emergency
- Do not leave your customer in the middle of a room. Show them to a chair, or guide them to a comfortable location;
- Don't walk away without saying goodbye.

Intellectual Disabilities

Intellectual disabilities affect a person's ability to think and reason. It may be caused by genetic factors such as Down Syndrome, exposure to environmental toxins such as Fetal Alcohol Syndrome, Brain Trauma, or Psychiatric Disorders.

A person with an intellectual disability may have difficulty with:

- Understanding spoken and written information
- Conceptual information
- Perception of sensory information
- Memory

Accessibility Information

People with intellectual or developmental disabilities may have difficulty doing many things that most of us take for granted. These disabilities can mildly or profoundly limit one's ability to learn. You may not be able to know that someone has this disability unless you were told, or you notice the way people act, ask questions, or use body language. As much as possible, treat your customers with an intellectual or developmental disability like anyone else. They may understand more than you think and they will appreciate you treating them with respect.

- Do not assume what a person can or cannot do;
- Use clear, simple language;
- Be prepared to explain and provide examples regarding information;
- Remember that the person is an adult and unless you are informed otherwise, can make their own decisions;
- Be patient and verify your understanding;
- If you can't understand what is being said, don't pretend. Just ask again;
- Provide one piece of information at a time;
- Speak directly to your customer, not their companion or attendant.

Speech Disabilities

Speech disabilities involve partial or total loss of the ability to speak. Typical disabilities include problems with:

- Pronunciation;
- Pitch and loudness;
- Hoarseness or breathiness;
- Stuttering or slurring.

Some people have problems communicating. It could be the result of cerebral palsy, hearing loss, or another condition that makes it difficult to pronounce words, causes slurring or stuttering, or not being able to express oneself or understand written or spoken language. Some people who have severe difficulties may use communication boards or other assistive devices.

- Where possible, communicate in a quiet environment;
- Give the person your full attention. Do not interrupt or finish their sentences;
- Ask them to repeat as necessary, or to write their message;
- If you are able, ask questions that can be answered in 'yes' or 'no';
- Verify your understanding;
- Patience, respect, and willingness to find a way to communicate are your best tools.

Learning Disabilities

Learning disabilities include a range of disorders that affect verbal and non-verbal information acquisition, retention, understanding and processing. People with learning disabilities may have an average or an above average intelligence but take in and process information and express knowledge in different ways. Learning disabilities may result in difficulties with:

- Reading;
- Problem Solving;
- Time Management;
- Way Finding;
- Processing Information;

The following information helps communicating with people who have learning disabilities:

- Learning disabilities are generally invisible and ability to function varies greatly;
- Respond to any requests for verbal information, assistance in filling in forms, etc., with courtesy;
- Allow extra time to complete tasks if necessary.

Mental Health Disabilities

Mental health disabilities include a range of disorders, however there are three main types of mental health disabilities:

- Anxiety;
- Mood;
- Behavioral.

People with a mental health disability may seem edgy or irritated, act aggressively, be perceived as pushy or abrupt, be unable to make decisions, start laughing or get angry for no apparent reason.

- 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 the customer exhibits unusual behaviour, focus on the service they need and how you can help.

Accessibility Information

Smell Disabilities

Smell disabilities can involve the inability to sense smells or a hypersensitivity to odors and smells. A person with a smelling disability may have allergies to certain odours, scents, chemicals, or may be unable to identify dangerous gases, smoke fumes, and spoiled food.

Touch Disabilities

Touch/tactile disabilities can affect a person's ability to sense texture, temperature, vibration, or pressure. Touch sensations may be reduced or heightened resulting in a hypersensitivity to touch, temperature, or the opposite, numbness and the inability to feel touch or sensations.

Taste Disabilities

Taste disabilities can limit the experience of the four primary taste sensations; sweet, bitter, salty and sour. A person with a taste disability may be unable to identify spoiled food or noxious substances.

Other Disabilities

Other disabilities may result from a range of other conditions, accidents, illnesses, and diseases including ALS, asthma, diabetes, cancer, HIV/AIDS, environmental sensitivities, seizure disorders, heart disease, stroke, and joint replacement.

Disabilities are not always visible or easy to distinguish.

Multi-Year Accessibility Plan

Message From the Company

Kaitlin Corporation is pleased to present the company's 2022-2027 Multi-Year Accessibility Plan, which highlights our commitment to create an inclusive and accessible experience for all of our purchasers and employees.

The Company recognizes the positive contributions that persons with disabilities have made in respects to the development and sales of our homes. As part of our commitment to a barrier free environment, we have developed this 5-year Accessibility Plan for our digital and physical spaces, including; services, sales, programs, and employment practices.

We are committed to diversity, inclusion, equality, and equity both in and out of the workplace. We believe all employees, regardless of their disabilities, deserve a safe and comfortable environment. We hope to build upon this foundation of inclusivity and commitment by continuing to strive for excellence and empowerment of our teams.

Please feel free to provide feedback on any of our accessibility documentation and policies.

Introduction

Kaitlin Corporation has been building award-winning communities of quality and distinction across southern Ontario for over three decades.

Kaitlin Corporation strives to meet the needs of its employees and customers with disabilities and is working to prevent barriers to accessibility. We are committed to fulfilling out all requirements under the **Accessibility for Ontarians with Disabilities Act, 2005 ("AODA")**. This accessibility plan outlines the steps that we are taking to meet requirements and to improve opportunities for people with disabilities.

Our plan shows how we will play our role in making Ontario accessible for all Ontarians. This plan is to be updated every five years. We are committed to training all personnel after being hired and providing additional training with each accessibility update. We maintain records of all training provided, including the dates on which training was provided and the number of individuals whom it was provided to.

Past Achievements to Remove Barriers

The Company continues to develop and implement accessibility initiatives under the **AODA** and will continue to meet compliance dates as required. We have completed and continue to complete the following:

- Establish policies and procedures on providing goods and services to persons with disabilities
- Have all documentation readily accessible on the Company website, www.kaitlincorp.com
- Implement accessibility tools compliant with **Web Content Accessibility Guidelines AA 2.0 standards** as per **AODA** regulations on the Company website
- Provide accessibility training to all employees within 30 days of hiring and put into place a training plan for existing employees
- Maintaining accessibility training certificates in all employee files
- Ensuring that all emergency safety information is accessible
- Ensuring that persons with disabilities are noted in our fire safety and evacuation plans
- Providing designated staff to inform emergency services of employees and customers with disabilities, in case of an emergency.

Action and Strategies

Customer Service

The Company is committed to providing accessible customer service to people with disabilities. This means that we will provide goods, services, and facilities to people with disabilities with the same high quality and timeless as others. The Company will achieve this by:

- Continue to provide excellent customer care service for people with disabilities
- Reviewing and updating policies as required by law or once every year, whichever occurs first
- Embedding accessibility requirements into staff training and orientation materials
- Reviewing customer feedback submitted to improve policies

Accessibility Information

Information and Communications

The Company is committed to making our information and communications accessible to people with disabilities. The Company will achieve this by:

- Developing documentation guidelines for accessible documentation options
- Providing purchasers, the opportunity to request accessible documentation regarding their home purchase
- Informing staff of alternative communication requirements, and ensuring they communicate them to the customer
- Providing alternative audio and visual documentation
- Informing customers of the availability of accessibility information

Employment

The Company is committed to fair and accessible employment practices. The Company is committed to ensuring the process of finding, getting, and keeping employment is accessible as possible. The Company is committed to ensure that no persons with disabilities will be discriminated against during the hiring process and are encouraged to apply themselves and fully participate. The Company will achieve this by:

- Reviewing human resources policies, practices and procedures to ensure accessibility to persons with disabilities throughout the employment process including but not limited to; recruitment, hiring, retention, career development, and return-to-work.
- Notifying all successful applicants of accessibility accommodations for disabilities
- Informing new and existing employees of our policies and procedures regarding accessibility
- Consulting with employees who have disabilities and providing alternative options to accommodate their needs

Accommodation Plans

Introduction

The Company is committed to providing equal treatment to all employees free from discrimination in accordance with the provisions set out in the **Ontario Human Rights Code (“OHRC”)**. This policy has been adopted to ensure that all employees and job applicants have access to workplace accommodation in accordance with the **Accessibility for Ontarians with Disabilities Act (“AODA”)**.

The Company will work to achieve a workplace free from barriers by providing accommodation for the needs of those individuals covered by the **Employment Standards Act (“ESA”)** and the **OHRC** up to the point where it causes undue hardship for the Company.

Duty to Accommodate

The Company is committed to ensuring that all individuals are protected under the OHRC and will consider any adjustments or modifications to the work, workplace, and general work environment, up to the point of undue hardship.

The Company encourages individuals to make any needs for accommodation known to their immediate supervisor or manager. The Company will work with the individual who requests accommodation to ensure that any measures taken to accommodate an individual covered by the ESA and the OHRC are both effective and mutually agreeable.

The Company will consult with the individual, and where appropriate, healthcare practitioners and other third-party specialists, to determine the most appropriate form(s) of accommodation.

Creating an Accommodation Plan

Any employee making a request for accommodation must make this request to their manager or immediate supervisor/manager. In addition, the Company may consider it appropriate to develop and implement an **Accommodation Plan (“Plan”)** for employees who are absent from work due to ill health, resulting from a disability.

The Plan may be used to facilitate or encourage return to work by the employee. The purpose of the Plan is to set out in writing the methods by which any modifications, amendments or adjustments to the workplace or the employees work shall be managed. In creating the Plan, the Company shall:

- Identify the requirement or rationale for accommodation.

Accessibility Information

- Determine the objectives for the effective performance of the employee in their role.
- Identify any barriers to the employee achieving that objective.
- Detail the options for accommodating the employee.
- Examine the options for accommodation and recommend the most appropriate.
- Outline how the accommodation process will be implemented.
- Identify any training or other support that may be required.
- Agree a timescale for implementation, review, and revision based on any feedback.

The Company can request an evaluation by an external medical professional or other professional person to determine if the Plan can be achieved, or how it can be achieved.

Where an Employee Cannot Be Accommodated

In some cases, it will not be possible to provide the accommodation request either in whole or in part. In such circumstances, the Company will inform the employee of the reason why the accommodation cannot be provided. In some circumstances, it may be necessary to accommodate the employee in another position. Where an employee is reassigned to an alternate position, the Company shall ensure that the employee has the necessary qualifications and/or skills to perform the role and can perform the tasks associated with the role.

Appropriate Accommodations

When considering appropriate accommodations, the manager or immediate supervisor/manager shall consider the following:

- Adjustments to the workstation, desk, or immediate work environment
- Changes to organizational policies, procedures, or practices
- Technical aids or assistive devices
- Providing materials in alternative formats
- Modifications or adjustment to the layout of the premises
- Amendments or modifications to working hours
- Leaves of absence
- Adjustment to work standards
- Changes to work uniforms or dress standards

Any accommodations may be temporary or permanent depending on the needs of the employee.

Accessibility Information

Accommodating Job Applicants

Any individual who applies for a job vacancy and informs the Company of the need for accommodation shall have any request considered in a manner that is respectful of our obligations under the AODA and the OHRC. Applicants will be informed that accommodations are available, upon request, for the interview and selection process. Where an accommodation is requested, the Company will consult with the applicant and provide or arrange for suitable accommodation.

Undue Hardship

The Company shall provide accommodation up to the point of undue hardship. Undue hardship may occur when:

- No process or appropriate accommodation exists
- The cost of providing the accommodation would cause excessive cost to the Company
- Where the accommodation would create a health and safety hazard
- It creates a detriment or has adverse impacts on other employees

Dispute Resolution

In the event that an employee requesting accommodation considers that their needs have not been met in a reasonable manner, they may submit a complaint in writing to the Complaints Officer, who will investigate the complaint in a reasonable time frame.

Confidentiality

All written and oral information and materials disclosed or provided by the Employer to the Employee under the accommodation plan constitutes as confidential information. All written and oral information and materials disclosed or provided by the employee to the employer under the accommodation plan constitutes as confidential information. Except as otherwise provided, confidential information will remain between the employer and the employee.

Accessibility Information

Accommodation Plan

If necessary, please fill out the form below. Please contact the office if you require assistance filling out the accommodation plan, or if you are not comfortable with completing this form digitally.

Employee Information

First Name: _____

Last Name: _____

Department: _____

Title: _____

Manager Information

First Name: _____

Last Name: _____

Department: _____

Title: _____

Accommodations

Start Date: _____

End Date: _____

Frequency of Review: _____

Limitations

List any functional limitations that the employee experiences, how it affects different aspects of his/her job and if each task is an essential part of the role.

Limitations:

Accessibility Information

Tasks/Activities Affected:

Essential Job Requirement?

Accommodations

Using the list of tasks from the limitations section above, identify what types of accommodation or support would help the employee accomplish the task. List a strategy or tool that will provide accommodation.

Tasks:

Accessibility Information

What must the accommodation achieve?

Accommodation Strategy:

Implementation

List the actions required to achieve the accommodation(s) identified in the prior section.

Action:

Accessibility Information

Assigned To:

Due Dates:

Information Sources

Identify and include the contact information for any experts consulted when building the plan. (e.g., human resources manager, specialists, family doctors)

Accessibility Information

Related Documents

If there are any related documents required for this accommodation plan, please attach them to the back of the plan. These documents are confidential and should only be shared with the appropriate parties involved in creating and implementing the accommodation plan.

List of Related Documents:

Comments and Notes

Employee's Signature

Date

Manager's Signature

Date

Emergency Procedures

Emergencies can occur at any time, and any place. The workplace is where most people spend a large portion of their days. It is pertinent that the Company maintain and update these policies in accordance with local fire codes, emergency procedures and ***The Integrated Accessibility Standards, Ontario Regulation 191/11 (“O.Reg 191/11”)***. This section will go over three key emergencies: Fire Safety, Lockdowns, and Environmental Situations.

Fire Safety

Introduction

Building safety and fire codes are continually being improved and updated, however, only recently have these standards begun to address the need for accessibility and exit strategies. Buildings must now be constructed in a way that enables everyone to enter, ensuring a rapid exit by at-risk individuals. Universal design is a way to create products and environments that are usable by everyone, regardless of their age or ability. The principles of universal design are viewed as a common-sense approach to integrating design practices that accommodate everyone, including older people, children, and people with or without disabilities. In most provinces and municipalities, emergency managers are required to develop building evacuation procedures for use in the event of a fire or other emergency. These procedures need to include the address, name of the building, and floor plan for each storey. Evacuation procedures should establish an area outside of the building where occupants can meet to ensure that everyone has evacuated the building safely.

Individual Evacuation Plans

Preparation and planning are the keys to surviving in an emergency, and strategies should be in place to prevent injuries for all building occupants. The more information that is captured in the emergency procedures and plans, the better equipped emergency managers will be in the event of an emergency. Please see below points to keep in mind when dictating your needs in the event of a fire evacuation:

- Access and disclose your abilities and limitations to emergency managers
- What communication works best for you: Visual or audio?
- Does the building have an appropriate notification system for you?
- Do you use assistive devices?
- Do you require additional evacuation devices?
- Do you have a preferred lift or carry method, if necessary?

Accessibility Information

Managers will keep the following in mind when creating an emergency plan:

- What are the communication requirements?
- What are your employees' physical strengths and weaknesses?
- Does the employee use assistive devices?
- What is their preferred lift or carry method?
- What are the language needs of the employee?
- Are evacuation devices available?
- Is the building elevator capable of a safe evacuation?

If you have any additional information regarding your disabilities and evacuation, please communicate it to your manager. Your manager will work with you to the best of their ability to ensure that a proper evacuation plan is in place. All evacuation information will be noted on the form found on the next page. This plan will only be shared with you and management. Your name and location will be provided to the building management to ensure that you are noted on their evacuation procedures. Assistance with filling this form will be provided upon request.

Accessibility Information

Individual Evacuation Plan

Employee Information

Name _____
Department _____
Office Number _____ Office Extension _____
Cell Phone _____ Alternate Phone _____

Emergency Contact Information

Name _____
Relationship _____ Office Number _____
Cell Phone _____ Email _____

Work Location

Address _____
City _____ Postal Code _____
Location In Office _____
Do you work in multiple office locations? Yes No
Other Location _____

Evacuation Information

Can you hear the fire alarm/security signal? Yes No N/A

If you need accommodation for this, please indicate below.

Accessibility Information

Can you activate the fire alarm/security system? Yes No N/A

If you need accommodation for this, please indicate below.

Can you talk to emergency staff? Yes No N/A

If you have a preferred method of communication, please list it below.

Can you use emergency exits? Yes No N/A

If you require accommodation with emergency exits, please explain below.

Does your mobility device fit in the emergency area? Yes No N/A

Do you have vision impairment? Yes No N/A

Can you exit the building by yourself? Yes No N/A

Can you get into an evacuation chair on your own? Yes No N/A

Accessibility Information

Can you handle the stress of an evacuation?

Yes

No

N/A

Please explain how emergency services can better accommodate you during an emergency.

Can you read/access emergency information?

Yes

No

N/A

Please explain the most convenient way for you to access emergency information.

If you need help evacuating, what can we do to help?

Accessibility Information

Emergency Support Staff

I consent to sharing this individualized emergency response information with the individuals below, who have been designated to help me in an emergency.

Employee #1

Name: _____

Phone Number: _____ Extension: _____

Cell Phone: _____ Location: _____

Type of Assistance:

Employee #2

Name: _____

Phone Number: _____ Extension: _____

Cell Phone: _____ Location: _____

Type of Assistance:

Employee #3

Name: _____

Phone Number: _____ Extension: _____

Cell Phone: _____ Location: _____

Type of Assistance:

Employee's Signature

Date

Manager's Signature

Date of Next Review

Standard Fire Safety Procedures

Standard Evacuation Procedure

Upon discovery of a fire:

1. Alert all occupants in the area and leave the fire area. Take the suite key if unable to locate any management staff.
2. Close all doors behind you.
3. Alarm the occupants of the building. Yell **"FIRE"** and activate the fire alarm system. Use the closest pull station on the floor. NOTE: There are (2) pull stations located in the Company Head Office building.
4. Call 911 and give the correct building address and location of the fire and your name. (315-220 Duncan Mills Road, North York, M3B 3J5.)
5. Use the exit to leave the building. Do not travel up in stairwells. Do not use the elevators.
6. Wait in the designated safety area. (In front of 220 Duncan Mills Road)
7. Keep clear of the lobby so that responding fire crews will have unimpeded access.
8. Do not return until it is deemed safe by a fire official.

Upon immediately hearing a fire alarm:

1. When you hear a fire alarm you must act quickly to ensure your safety.
2. Use the exit to leave the building. Do not travel up in stairwells. Do not use the elevators.
3. Wait in the designated safety area. (In front of 220 Duncan Mills Road)
4. Keep clear of the lobby so that responding fire crews will have unimpeded access.
5. Do not return until it is deemed safe by a fire official.

If you cannot leave your suite or floor area because of a fire, remain in your suite and:

1. Close the door but leave it unlocked for possible entry by fire fighters.
2. Dial 911 and tell the fire department where you are located.
3. Seal all cracks where smoke can enter by using wet towels or sheets. Seal mail slots, transoms, and air-conditioning outlets as necessary.
4. Keep low to the floor if smoke enters the room
5. Move to the most protected room and partially open the window for air. Signal fire fighters by waving a sheet/towel. Close the window if smoke comes in.
6. Wait to be rescued. Remain calm. Do not panic or jump.
7. Listen to instructions and information given by authorized personnel.

Accessibility Information

Fire Safety Tips

- Before opening a door, feel the door, and doorknob for heat. If they are not hot, brace yourself against the door and open it slightly. If you see smoke, feel air pressure, or a hot draft, close the door quickly.
- Do not use the elevator.
- If there is smoke, do not enter the stairway. Go to an alternate exit and again open the door carefully.
- Never go to the roof- smoke rises. Doors to the roof are locked and you may become stuck.
- Remember to stay low to the ground if you are in a smoke-filled environment. The air is cleaner near the floor.
- Be aware of other occupants requiring assistance, or who may have trouble evacuating on their own.
- If it is safe to do so, assist building occupants with evacuation as needed.

Lockdowns

Lockdown procedures are defined in the Violence in the Workplace Prevention Guide (Canadian Centre for Occupational Health and Safety) as meaning “... the people in a building take refuge in a secure location, e.g., in offices or classrooms. Lockdown procedures are usually initiated when it is unsafe to evacuate the building.”

Certain risk factors may be identified during workplace violence risk assessments that would separately or in combination warrant the development and implementation of lockdown procedures for a facility or group of facilities. Such risk factors may include:

- Past occurrences at the facility or similar type of facility
- Past occurrences at neighboring facilities
- Proximity of the facility to potentially risk areas (schools, courts, etc.)
- Advice of the Police Services

Lockdown procedures are developed to reduce the number of casualties that can occur if there is a dangerous person on the grounds. While physical threats are normally attributed to an armed intruder or hostage taker, this is not the only case. Physical threats may come in the form of any individual or group of individuals, with or without any type of weapon, causing intent to injury. Some examples of physical threats are workplace violence, domestic violence, violent protests or demonstrations, violent occupations, a criminal act occurring near the office, a law enforcement apprehension near the facility. Lockdown procedures take place in all of these instances.

There are three types of lockdowns that will be addressed in this section: Shelter-In-Place, Hold and Secure, and Full Lockdown. If you are concerned about your mobility during a lockdown, please consult with your manager to develop a lockdown safety plan. A lockdown safety plan will be kept with your manager and designated assisting employees. In instance of a lockdown, the plan will be put into place to ensure the safety of all he Company employees. In case of an emergency evacuation, your manager will notify police if you require assistance to evacuate.

Shelter in Place

This type of lockdown is normally referred to when an environmental threat is present outside, and it is not possible or advisable to evacuate the facility. This type of action is normally in response to an air contaminant and involves keeping the air contaminants outside the building and keeping persons from unnecessarily putting themselves in medical danger. In the case of external health hazard, where it is not possible or advisable to evacuate the building, the following procedures are recommended:

- A building manager, security, or someone in authority making an announcement of a shelter in place over the facility's public address systems or other means of communication. Since some facilities do not have emergency notification systems, other means of communication will need to be developed.
- All interior personnel should be advised to move upwards to an interior room on a higher floor since many agents are heavier than air.
- All interior personnel should close windows and doors.
- Building Operations staff should:
 - Ensure exterior doors are locked.
 - Turn off the heating, air conditioning and ventilation systems.
 - Check the inventory of openings to ensure that no openings have been overlooked.
- A building manager, security, or someone in authority should monitor radio or television stations for further updates and have occupants remain in the shelter in place mode until authorities indicate it is safe to come out.

Hold and Secure (Partial Lockdown for Danger due to a Threat)

This type of lockdown is used when a serious environmental/physical threat is present outside of the facility or in the neighbourhood and prevention measures need to be enacted to:

Protect individuals from leaving the facility and entering into an area of danger; or

Prevent the threat from entering the facility.

This scenario involves immediate precautions, including:

- A building manager, security, or someone in authority making an announcement to hold and secure over the facility's public address system or other means of communication will need to be developed.
- This communication should advise individuals inside the building of the threat, not to leave the facility, to control movement inside the facility, and to advise that further updates will be provided. A sample wording for use on a public system could start with "Attention, attention, this is a security alert. We are implementing a 'hold and secure.'"
- A designated individual(s) physically securing entrance doors.
- Closing all blinds and drapes.
- Turning off room lights.
- Keeping all persons away from windows.

Accessibility Information

- All individuals preparing to move into a full/complete lockdown if required.

Full Lockdown for Danger due to Physical Threat Inside the Facility

This type of lockdown is used when the physical threat is already in the facility and measures need to be enacted to:

- Prevent the threat from accessing areas/assets being threatened.
- To protect individuals from entering areas where the threat may be present.
- To protect individuals from remaining in areas where a threat may be moving to.

This scenario involves immediate precautions including:

- A building manager, security, or someone in authority making an announcement of a COMPLETE lockdown over the facilities public address system or other means of communication.
- Individuals outside the facility should not enter the facility but instead lead away from the building and meet at a pre-arranged evacuation point which will be determined by management.
- Individuals inside the facility should:
 - Remain in the room in which they are located
 - If in a hallway, immediately head to a closet and lock the door
 - Supervisor staff should look quickly into the hallways and let non-threatening personnel into the room, and lock the door
 - All individuals should move down onto the floor unless they hear otherwise from someone in authority
 - All individuals should make as little noise as possible
 - Individuals should turn off cell phones, computers, tablets, etc.
 - Close all windows and curtains
 - Turn lights off
 - Keeping all persons away from windows

Policy Administration & Feedback

If you have any questions or concerns about this policy or its related procedures, please contact:

By Mail: Kaitlin Corporation
 ATTN: Human Resources

Accessibility Information

315-220 Duncan Mill Road, North York, ON M3B 3J5

By Phone: 905-642-7050

By Email: hr@kaitlincorp.com

By Feedback Form: www.kaitlincorp.com/Accessibility