

A – 10.0 Accessible Customer Service Policy (Newmarket only)

A – 10.1 Purpose and Background Information

The Accessibility for Ontarians with Disabilities Act, 2005 ("the AODA") is a Provincial Act with the purpose of developing, implementing and mandating accessibility standards in order to achieve accessibility for persons with disabilities; with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. Under the AODA, Ontario Regulation 429/07, entitled "Accessibility Standards for Customer Service" ("the Regulation"), came into force on January 1, 2008. The Regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or other third parties.

The objective of this policy is to identify what the equal treatment provisions of the Ontario Human Rights Code, through the AODA and the Regulation, require as a minimum legal standard in program design and service delivery to persons with disabilities and addresses the following:

- The provision of goods and services to persons with disabilities;
- The use of assistive devices by persons with disabilities;
- The use of service animals by persons with disabilities;
- The use of support persons by persons with disabilities;
- Notice of temporary disruptions in services and facilities;
- Training;
- Customer feedback regarding the provision of goods and services to persons with disabilities;
- Notice of availability and format of documents.

A – 10.2 Scope

Bill Gosling Outsourcing strives at all times to provide services in a way that respects the dignity and independence of persons with disabilities. It applies to all employees, volunteers, visitors, and third party contractors.

A – 10.3 Policy Statement

In accordance with the Accessibility for Ontarians with Disabilities, Ontario Regulation 429/07, Accessibility Standards for Customer Service, Bill Gosling Outsourcing is committed to providing a working and learning environment that is accessible and inclusive to all persons who work, or visit our sites. It is the policy of the Company that its working and learning environments will be free from discrimination and harassment as defined by the Ontario Human Rights Code.

A – 10.4 General Principles

In line with The Provision of Goods and Services to Persons with Disabilities, Bill Gosling Outsourcing will strive to ensure that its policies, practices and procedures are consistent with the following core principles as outlined in the AODA.

Dignity – Goods and services are provided in a manner that is respectful to persons with a disability and does not diminish the person’s importance.

Independence - Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

Integration - Persons with disabilities can access all goods and services. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

Equal Opportunity - Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

Components of the Policy

A – 10.5 Communication with Persons with Disabilities

When communicating with a person with a disability, the Company will do so in a manner that takes into account the person’s disability. Bill Gosling Outsourcing commits to provide training on customer service to all current and future employees and volunteers. This training will, in particular, include how to interact and communicate with persons with various types of disabilities.

A – 10.6 Notice of Planned or Unplanned Disruption in Services and Facilities

In the event of a service disruption to our site that can affect employees, visitors, contractors or members of the general public, it is the responsibility of Bill Gosling Outsourcing to take reasonable steps to report such disruption in a timely matter through appropriate information channels. Such channels include, but are not limited to, Bill Gosling Outsourcing website (Emergency Training materials and BCP plans), physical postings (temporary signage) on or immediately adjacent to the affected area, and/or communication via email to affected individuals, departments or groups. In accordance with the AODA, notice must be conspicuous and indicate any alternatives that exist to allow access to persons with disabilities during the disruption. The required information necessary for any communication of a temporary disruption may include:

- The time, date and location of the disruption;
- Information about the reason for the disruption;
- Anticipated duration of the disruption;
- Descriptions of alternative facilities or services, if any; and
- Contact information for the responsible service area.

A – 10.7 Assistive Technology

Personal assistive technologies are permitted and unrestricted in all areas of the company to which employees and the public have access, except when subject to operator safety and/or company integrity. Bill Gosling Outsourcing will train, on an ongoing basis, current and future employees and volunteers in the use of various assistive devices and related policies. Bill Gosling Outsourcing will also provide an updated list of various assistive technologies available to employees and volunteers (see Appendix A). It

should be noted that the provision, use and safety of personal assistive devices is the responsibility of the person with a disability.

A – 10.8 Service Animals

Persons with a disability who are accompanied by a service animal may access premises owned or operated by Bill Gosling Outsourcing, if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, the Company will ensure that alternate means are available within reasonable time and location to provide persons with a disability access to the services.

There may be rare circumstances where, for reasons of health and safety of another person, allowing a person with a disability to enter a premise accompanied by a service animal needs to be considered.

Examples of such situations include but are not limited to:

Where a person is allergic to animals and adversely affected if they are in close proximity to a service animal. If deemed necessary, a risk assessment will be conducted by a member of the Human Resources team in conjunction. This assessment will identify:

- a) The risks inherent with the service animal being in the area of concern;
- b) Alternate measures available to enable the person with a disability to access this service. If it is not readily apparent that an animal is a service animal, a Human Resources Representative or member of the management team may ask the person with the service animal to provide verification of the animal's duty. It should be noted that the use and safety of the service animal is the responsibility of the person with a disability.

A – 10.9 Support Persons

Bill Gosling Outsourcing welcomes employees and visitors who are accompanied by a Support person, when the support person has been hired or chosen by the person with a disability to accompany them in order to assist in accessing goods or services and/or for the purposes of providing support with mobility, personal assistance and/or communication. Persons with a disability who require a support person may access premises owned and/or operated by the company with their support person, provided the interaction between the person and their support person does not compromise academic integrity. Support persons are permitted to accompany employees with disabilities to their work and learning environments. Individuals who are accompanied by a support person are encouraged to inform relevant persons of their participation.

There may be rare circumstances where, for reasons of health and safety of another person, allowing a person with a disability to enter a premise accompanied by their support person needs to be evaluated. Examples of such situations include potential fire code violations.

If deemed necessary, a risk assessment will be conducted by a Human Resources Representative and a member of the Management team. This assessment will identify: a) the risks inherent with the support person being in the area of concern; and b) alternate measures available to enable the person with a disability to access this service.

Support persons shall be permitted entry to all Bill Gosling Outsourcing facilities and meeting rooms.

A – 10.10 Feedback

Feedback about the delivery of services to persons with disabilities is welcomed, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be by telephone, in person, in writing, or by delivering an electronic text via email, or otherwise. The Organization will make best efforts to provide a response in the same format in which the feedback was received. Where possible, feedback will be addressed immediately. Some feedback may however, require more effort to address and may need to be reviewed before an action is taken. Feedback may be provided directly to the Human Resources Department:

Mail:
16635 Yonge Street, Suite 26
Newmarket, Ontario
L3X 1V6
Fax: 416-649-3270

A – 10.11 Training

Bill Gosling Outsourcing shall provide training on AODA customer service to all current employees and volunteers and, in particular, to those providing services and who are involved in the development and approval of customer service policies, procedures and practices. New employees will be provided such training as part of their orientation. As required, training by a qualified staff member will also be provided to those individuals needing specific requirements. Through the relevant hiring department, Bill Gosling Outsourcing shall also require volunteers, new employees, student monitors, and/or third party contractors to provide proof of AODA customer service training as a condition of contract.

Such training shall include:

- A review of the purposes of the AODA and the requirements of the Accessibility Standards for Customer Service;
- How to interact and communicate with persons with various types of disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use the available equipment or devices that may assist with the provision of services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing OCAD services;
- How to develop and review policies, procedures and practices relating to the provision of services to persons with disabilities.

Documentation of training of employees, monitors, volunteers, will be maintained by Human Resources and third party Contractors shall be maintained by the relevant department as required by law.

A – 10.12 Availability and Format of Documents (Alternative Formats)

All documents required by the Accessibility Standards for Customer Service, including the Bill Gosling Outsourcing's Accessible Customer Service Policy, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to the Freedom of Information and Protection of Privacy Act ("FIPPA"). When providing these documents to a person with a disability, the

organization will endeavor to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

Notice of the availability of documents required by the Accessibility Standards for Customer Service will be posted on the company's portal.

A – 10.13 Definitions

Accessible means obtainable, usable, readable, audible, visible, understandable, clear, able to be entered and exited, flexible, etc. To be accessible to all people, a variety of accessibility plans are necessary.

Ensuring inclusive practices will ensure that all goods and services can be accessed by a larger audience. Alternate Formats refers to alternate ways to provide goods and services. This may be through forms of communication such as speech or writing, or methods such as in person or over the phone. Other examples are large print, electronic text (Word or html), Braille, sign language interpretation, communication devices, media caption, etc.

Assistive Devices are equipment that people with disabilities utilize to assist in their daily lives at home, work, school, etc. Such devices could be a walker, scooter, cane, magnification or specialized learning software, communication board, etc.

Assistive Technology is equipment or software such as screen reading, audio recording and voice recognition which people with disabilities use to obtain information and communicate with others.

Customer is the term used in the AODA Legislation to describe patrons, stakeholders or anyone in receipt of goods and services. The primary recipients of Bill Gosling Outsourcing's services are the employees who use the facilities, including training rooms, offices, lunch room and gym. Other individuals, such as former employees, prospective new employees and current employee's family members whom may be using the on-site fitness facility and members of the broader community, may be entitled to certain Bill Gosling Outsourcing services.

Disability, under the AODA, is the same as the definition in the Ontario Human Rights Code:

- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device;
- b) A condition of mental impairment or a developmental disability;
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) A mental disorder; or
- e) An injury or disability for which benefits were claimed or received under the Insurance plan established under the Workplace Safety and Insurance Act, 1997.

Employee refers to any Bill Gosling Outsourcing employee, contractor or temporary employee

Service animal is any animal used by a person with a disability for reasons relating to the disability or where the person provides a letter from a physician confirming that they require the animal for reasons relating to their disability; or where the person provides 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.

Support Person is someone who accompanies a person with a disability in order to assist them. Their assistance may include, but is not limited to, communication, mobility, personal care, medical needs or with access to goods or services.

Bill Gosling Outsourcing premises are any buildings and/or lands owned, leased, operated, controlled or supervised by the company.

Volunteer is a person who provides services to the Bill Gosling Outsourcing for which they are not being paid.