
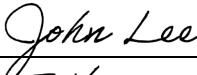
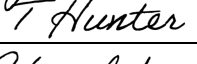




# ACCESSIBILITY

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**Policy**

This Statement of Commitment is our intent in ensuring our goal of improved accessibility for individuals with disabilities. Ron Lee Construction Inc. endeavors to provide accessibility and accommodation as prescribed applicable by law under the Accessibility for Ontarians with Disabilities Act (AODA), Ontario Regulation 191/11 (“Integrated Accessibility Standards”).

Under this policy, RLC shall:

- Be committed to the principles of independence, dignity, integration, and equality of opportunity as described in the ADOA.
- Review our policies, practices and procedures and establish new ones if necessary, to comply with the Integrated Regulation, specifically in the areas of information and communication, to meet the accessibility needs of people with disabilities in a timely manner.
- When communicating with or otherwise providing information to a person with a disability, Ron Lee Construction Inc. will provide the information and communication in a manner that takes into account the person’s disability.
- Continuously review and improve accessibility in our premises and facilities as required by law, as well as to the services offered to clients, employees, volunteers and members of the general public.
- Establish, implement, maintain and document an accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under the Integrated Regulation.
- Provide training to all employees, volunteers, persons who deal with clients and the public on behalf of Ron Lee Construction Inc, and persons participating in the development and approval of Ron Lee Construction’s policies, practices and procedures, on the requirements under the Integrated Regulation and the Human Rights Code, or similar applicable laws, as it pertains to persons with disabilities.

**Scope**

This policy and procedure apply to all operations and locations of Ron Lee Construction Inc.

This document shall outline the measures, policies, practices or other requirements for the identification, removal and prevention of barriers with respect to goods, services, facilities, accommodation, employment, buildings, structures, premises or such other things as may be prescribed and is applicable to the operations of Ron Lee Construction Inc.

This document also serves as the requirement for Ron Lee Construction Inc. to implement these measures policies, practices or other requirements within the time periods specified in the standard.

There are 5 areas of daily life where persons with disabilities may struggle with:

- Customer Service
- Information & Communications
- Transportation
- Employment
- Design of Public Spaces

The accessibility standards reviewed in this document cover the aspects of *Customer service, Information & Communications* and *Employment, Transportation and Design of Public Spaces* do not apply to our company scope.

### Related Standards

- Accessibility for Ontarians with Disabilities Act, 2005
- O. Reg. 191/11 Integrated Accessibility Standards
- Communication [RLC-HS-PRO-012]
- Record Control [RLC-QA-PRO-002]
- Return to Work & Modified Work Program [RLC-HR-PRO-006]
- Training [RLC-HS-PRO-011]
- Communication [RLC-HS-PRO-012].

### Roles and Responsibilities

#### *Company responsibilities*

- Notify customers and clients that the documents related to the Accessibility Standards are available upon request and can be provided in a format that will accommodate an individual's disability.
- Ensure this policy and related practices and protocols, are made available to any member of the public upon request.

#### *Management*

- Provide relevant training to all employees, and others who deal with the public, customers, clients or third parties on their behalf, as well as to those who are involved in the development and approvals of accessibility policies, practices and procedures, in the particulars of this policy and its related standards.
- Responsible for ensuring all departments adhere to the parameters set out in this policy as it relates to goods, services, programs and facilities.
- Foster an inclusive environment within the company.

#### *Supervisors*

- Managers and supervisors are responsible for adhering to the parameters set out in this policy as it relates to goods, services, programs and facilities.
- Managers and supervisors will foster an inclusive environment within their areas of responsibilities.

*HR Department*

- Ensure that all employees and volunteers are trained in regards to legislative requirements of the Accessibility for Ontarians with Disabilities Act and the Human rights Code as it relates to people with disabilities.
- Ensure all legislative requirements of the Accessibility for Ontarians with Disabilities Act and the Human Rights Code are adhered to.
- Oversee the feedback procedure as outlined in this policy.
- Review this policy & procedure

*Employees*

- Responsible for practicing good client and customer service and adhering to the parameters set out in the policy.
- Employees are responsible for informing the Human Resources Department of any accessibility requirements for a disability they may have.

**Definitions**

Accessible Formats – may include but are not limited to, large print, recorded audio and electronic formats usable by persons with disabilities.

Assistive Device –any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living

Barrier –anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information barrier or communications barriers, an attitudinal barrier, a technological barrier, a policy or practice

Disability –As defined in Section 10 of the Human Rights Code, R.S.O. 1990 c.H.19:

- 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
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act

Service Animal – means any animal individually trained to do work or perform tasks for the benefit of a person with a disability

Support Person – means any person whether a paid professional, volunteer, family member or friend that accompanies a person with a disability in order to help with communications, personal care, medical needs, or with access to goods or services

### Overview

This policy & procedure is established in the pursuit of ensuring equal access and participation for people with disabilities. This includes workers, volunteers, visitors to an RLC site, clients, subcontractors, and members of the public who may wish to interact with the company.

The requirements for meeting accessibility needs shall follow those given under the Accessibility for Ontarians with Disabilities Act and Ontario’s accessibility laws and which shall be defined further in this document.

### Training

Training in Accessibility processes and systems shall be given to:

- Staff and volunteers,
- those that develop the organization’s policies and;
- those that provide goods, services or facilities on the organization’s behalf.

Training on accessible customer service shall be given in a manner that is relevant to the individual’s role. This training shall include:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the Ontario Human Rights Code.
- Training on Customer Service Standards. According to the person’s role and duties, training in Information & Communication as well as the Employment standards shall also be given.
- This policy and related procedures
- Expected behaviours of employees
- 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
- Where to find and how to use available on-site aids designed to assist persons with disabilities. This includes wheelchair ramps.
- How to respond to requests for alternate means of service or suggestions for improvement.

Training shall be given as follows our “Training” procedure [RLC-HS-PRO-011] and “Communication procedure [RLC-HS-PRO-012]. Training, as per these procedures, can be a combination of virtual and practical demonstration.

Training shall be done as part of the onboarding program (at employment or project start up), will be an ongoing process and shall be refreshed where there are policy changes.

**Using Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Ron Lee Construction. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. Considerations which shall be given can be:

- Providing the service in an alternative format- such as virtually or audibly.
- Delivering the good/service instead
- Providing video recordings of the area/good/service in question

These considerations are not exhaustive and other alternate measures can be identified dependent on the situation.

**Communication and Accessible formats**

When communicating with a person with a disability, individuals shall do so in a manner that takes into account the person’s disability and makes reasonable efforts to have the person with a disability understand both the content and the intent of its communications. The Communication procedure [RLC-HS-PRO-012] list various forums which can be utilized; however, judgement must be made to adjust these forums to ensure it is given in an accessible format to the person receiving it. Forums listed are:

- Letters
- Client meetings
- Reports
- Email correspondence
- Online training platform
- Website
- Phone call/conference call
- Client information portal

Communicators must select the most effective communication method for the information being presented considering whether a person’s disability may hinder their satisfactory receipt of information.

Alternative means of communicating can include (but not limited to):

- Auditory communication channels (phone calls, voice messages, dictated messages)
- Larger font size, and sans-serif font, high contrast font, braille for written communication
- Using website accessible features

We shall always consult the individual to determine what method of communication works for them.

### Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties; i.e.; our office location. An animal is considered a service animal if:

- it can be readily identified as one being used because of the person's disability e.g., if it wears a harness, vest or other visual indicator or
- the person with a disability provides documentation from a regulated health professional

Where unsure, our staff may ask individuals to provide documentation from a regulated health professional which must confirm that the person needs the service animal for reasons relating to their disability.

Staff must not touch, pet, address or otherwise hinder a service animal in their job for assisting the individual with a disability.

### Support Persons

A support person to a person with a disability is free to accompany the individual on our premises which are open to the public. At no times will a person with a disability, who is accompanied by a support person, be prevented from having access to his or her support person while on Ron Lee Construction's premises.

### Notice of Temporary Disruption

In the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities, Ron Lee Construction will provide customers with notice as far as reasonably practicable. This notice will be posted in a high traffic area and will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services if available. For example, if our website is conducting upgrades and will be temporarily unavailable, a landing message on the website shall be as follows:

**Our website is undergoing some necessary changes to improve our services to you. This disruption is only temporary until < Date & Time >**  
**Please contact our offices through any of the forums below in the meantime so we may assist promptly:**  
**Email: [mail@ronleeconstruction.ca](mailto:mail@ronleeconstruction.ca)**  
**Phone: [\(905\) 628-4148](tel:(905)628-4148)**

### Feedback

Suggestions on improving our Accessibility provisions is welcomed as it assists RLC in identifying barriers and improving our service to all persons. Feedback can be given through any communication method such as:

- Verbal to any of our employees
- Written suggestions through normal postal mail at  
*439 Highway # 8  
Dundas, ON L9H 5E1*
- Through our company website at the “Contact us” link
- Written suggestion to email [mail@ronleeconstruction.ca](mailto:mail@ronleeconstruction.ca)
- Written suggestion to any other company individual email if known
- Calling our phone number [\[\(905\) 628-4148\]](tel:(905)628-4148)

For feedback to be delivered, some form of contact information is kindly requested. All feedback will be directed to our HR Department, where correspondence/feedback shall be given in approximately 5 working days.

### Notice of Availability

Documents related to Accessibility, including this one, shall be made available in an accessible format or with communication support, upon request. A notice of doing so shall be given on our company website, and where correspondence is done in pursuit of recruitment, this notice shall be included in the posting of the job vacancy.

We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

### Employment

During the course of employment, from the posting of a job availability, to their ongoing employment, accommodation will be made for all employees who require accessibility arrangements due to a disability. We will:

- Notify job applicants during the posting of the vacancy that accommodations can be made during recruitment and hiring.
- Notify short listed job applicants that accommodations are available upon request and we shall consult with them directly to recognize and provide the specific accommodations that must be made.
- Notify successful applicants of policies for accommodating employees with disabilities when making offers of employment incorporated into their contract.
- Provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee’s accessibility needs due to a disability.
- Ensure information that is needed by the employee in order to do their job, as well as information is readily available to others in the workplace is made available in an accessible format to the individual.



- Stemming from the point above, workplace emergency response shall be customized (if required) to ensure the safety of the individual with a disability, and that information on this customized plan is given to the employee in an accessible format. (Expanded in section below).

**Emergency Response plan**

Where there is a need to customize an emergency response plan to accommodate an individual with a disability, this shall be done as soon as reasonably practicable during their onboarding process. This can reasonably be developed during the hiring process, in consultation with the individual to determine the accommodations that must be made. Consideration shall be given such as:

- Assigning an individual/s as an aide in times of emergency response such as evacuation
- Ensuring that emergency notification devices that are used to alert persons to an emergency are effective in notifying the person with a disability, and installing these devices in required areas as necessary.
- Reviewing employee space to assign workspace closer to an evacuation area.
- Reviewing emergency signage for accessibility if possible.

Emergency Response plans are reviewed on at least an annual basis and shall include the ideals of improved accessibility options into these reviews. Reviews shall also occur where an employee moves to a different location in the organization and this may impact the corresponding emergency response, as well as if an individual’s needs change.

This individualized workplace emergency response information shall be provided to the employee in a format of their choosing.

**Accommodation plans**

The specifics of accommodation which apply to an employee and shall be established at RLC, shall be documented as an accommodation plan. This will be established upon consultation and agreement by both employer and employee. This may be established at the time of hiring however shall have reasonable review timelines to ensure that the accommodations being made continue to be relevant, suitable and satisfactory.

The duty to accommodate is limited only by a result of undue hardship, where if accommodation would cause serious interference with the running of the company. We shall abide by the Ontario Human Rights Code for guidance in this event.

**Modified & Return to Work**

This is a type of accommodation plan specifically for employees who have sustained an occupational illness or injury and which may or may not have resulted in a form of permanent or temporary disability. The goal of this program is to return the worker to their pre-injury position within the company, through ensuring the employee has the best opportunities available for successful return to work, or to the labour market in general. The “Return to Work & Modified Work Program” [RLC-HR-PRO-006] gives more information on the steps the company will take to facilitate the return to work and will include documented accommodation plans for each individual as part of the process.

**Review**

This policy and procedure are subject to change from for example, our internal company structure may change over time, changes in legislation, changes identified from internal review or received via our feedback process.

This procedure shall be reviewed on at least an annual basis but sooner if required, and consider the changes which must be implemented if any. Changes shall be incorporated within our “Corrective Action Log [RLC-HSE-REG-003] and tracked for status. Changes shall be maintained and recorded via our “Records Control” [RLC-QA-PRO-002] procedure.

**Records**

Records arising from this procedure include Accessibility Compliance Reports (ACR), which is required to be completed every three (3) years and submitted to the Ontario Government. These reports contain information on the status of the company’s compliance with reference to the AODA obligations. Submitted reports shall be made available to the public via the company website as well as posted at our company head office. An alternative accessible copy of this report may be requested via any of the channels listed through the “Feedback” section.



REVISION HISTORY

Rev #	Revision Date	Nature of Revision	Approved by
REV1	01/07/2023	Revised format of previous policy/procedure (HS-1312) Changed document name.	K .Lee