

## AODA Policy & Accessibility Plan

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### Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service*, *The Accessibility Canada Act*, and the *Accessibility for Ontarians with Disabilities Act, 2005*. This applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

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

Campbell Group of Companies has established a multi-year accessibility plan to prevent and remove barriers to accessibility and to meet requirements under the *Accessibility Canada Act*, *Accessibility for Ontarians with Disabilities Act* and integrated accessibility standards.

### Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by Campbell Group of Companies.
- b) This policy applies to all employees, (including volunteers, interns, students, etc.) that act on behalf of Campbell Group of Companies including when the provision of goods and services occurs off the premises of Campbell Group of Companies.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by Campbell Group of Companies
- d) This policy shall also apply to all persons who participate in the development of the Campbell Group of Companies policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

### Definitions

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 assistive 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.

Barrier: Anything Physical, architectural, or attitudinal, anything that is based on information or communications, or anything this is the result of a policy or a practice that hinders the full and equal participation in society of a person with an impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment, or a functional limitation.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, 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, 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or

- An injury or disability for which benefits were claimed or received under the insurance plan established by each province.

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 – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request documentation from a regulated health professional confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

### **Common Barriers**

In accordance with the *Accessibility Canada Act* this policy addresses may barriers and addresses the possible solutions to go with them:

#### Attitudinal Barriers:

**Barrier:** Thinking that people with intellectual disabilities are not able to make decisions.

**Solution:** Do not assume that employees or customers with the disability can or cannot do. Ask them.

**Barrier:** Believing a person who has a mental health disability or someone who uses a wheelchair would not be a good employee.

**Solution:** Learn different ways we can accommodate employees with these types of disabilities.

#### Informational and Communication Barriers:

**Barrier:** Print is too small to read.

**Solution:** Ensure everyday documents, like signs are easy to read by making sure that the print is legible for most people.

**Barrier:** Complicated, confusing, or busy signage.

**Solution:** Ensure to keep signs clean and clear. Make information available in another form, such as a chart or pictogram.

#### Technological Barriers:

**Barrier:** Accepting only online job applications

**Solutions:** Welcome job applications in a number of formats

**Barrier:** Having only one way for our customers to reach us, for example, by telephone only.

**Solution:** Allowing customers to contact us through other resources such as email.

#### Systemic Barriers

**Barrier:** Hiring policies do not encourage applications from people with disabilities.

**Solution:** Review current hiring processes to identify and remove barriers, such as inaccessible locations for interviews.

**Barrier:** Procedures may exclude some employees, such as directing maintenance/housekeeping staff to only use certain cleaning products that can cause allergic reactions.

**Solution:** Implement a "Fragrance -Free" Policy.

### Physical and Architectural Barriers

**Barrier:** Event or meeting spaces are inaccessible.

**Solution:** When planning an event, don't just think about ramps, consider the washrooms, lighting and signage.

### **General Principles**

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, and the *Accessibility Canada Act* this policy addresses the following:

#### A. The Provision of Goods and Services to Persons with Disabilities

Campbell Group of Companies will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration 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;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

#### B. Assistive Devices

##### Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Campbell Group of Companies.

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.

#### C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law.

##### Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Campbell Group of Companies may request verification from the customer.

Verification may include:

- Documentation from a regulated health professional confirming that the person requires the animal 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, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

#### Allergies:

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

#### D. Support Persons

If a customer with a disability is accompanied by a support person, Campbell Group of Companies 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, Campbell Group of Companies 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.

#### E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Campbell Group of Companies. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Campbell Group of Companies 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.

#### F. Feedback Process

Campbell Group of Companies must 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. Feedback forms will be available upon request.

#### **Submitting Feedback:**

Customers can submit feedback to:

- Sarah Syer - Director, Operations and Human Resources
- 1-800-265-6015 ext. 10243
- 55 Midpark Cres. London ON N6N 1A9
- sarah.syer@canadamoving.com

Customers who wish to provide feedback verbally can do so to any Campbell Group of Companies employee.

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

#### G. Training

Training will be provided to:

- All employees (including volunteers, interns, students, etc.) that act on behalf of Campbell Group of Companies.

#### Training Provisions:

As reflected in *Ontario Regulation 429/07 and Accessibility Canada Act*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07 and Accessibility Canada Act*.
- 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
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Campbell Group of Companies policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

#### Training Schedule:

Campbell Group of Companies will provide training as soon as possible. Training will be provided to all employees (including volunteers, interns, students, etc.) that act on behalf of Campbell Group of Companies. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

#### Record of Training:

Campbell Group of Companies will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

#### Administration

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

- Sarah Syer – Director, Operations and Human Resources
- 1-800-265-6015 ext. 10243
- 55 Midpark Cres. London ON N6N 1A9
- sarah.syer@canadamoving.com

This policy and its related procedures will be reviewed as required in the event of legislative changes.

#### Referenced Documents:

- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Accessibility Standards for Customer Service, Ontario Regulation 429/07*
- *Blind Person's Rights Act, 1990*
- *Ontario Human Rights Code, 1990*
- *Health Protection and Promotion Act, Ontario Regulation 562*
- *Accessible Canada Regulations*
- *Accessibility Canada Act (ACA)*