



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) POLICY

Customer Service Standards and Integrated Accessibility Standards Policy for People with Disabilities

Statement of Commitment

The Scarborough Golf and Country Club Limited (SGCC) is committed to excellence in serving all members and guests, including people with disabilities. We will endeavor to ensure equal access by meeting the accessibility needs of people with disabilities in a timely manner. This Policy is intended to meet the requirements under the Accessibility for Ontarians with Disabilities Act, 2005; Ontario Regulation 429/07; and Ontario Regulation 191/11.

Accessible Formats

Upon request, and in accordance with the compliance schedule set out in the Ontario Regulation 191/11, SGCC will provide or arrange for the provision of Accessible Formats and Communication Supports for persons with disabilities in a timely manner. SGCC will consult with the person making the request in determining the suitability of an Accessible Format or Communication Support.

For the purposes of this Policy, "**Accessible Formats**" may include, but are not limited to large print, recorded audio and electronic formats, Braille and other formats usable by people with disabilities. "**Communication Supports**" may include, but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Definitions

For the purpose of this Policy, "**disability**" is defined as follows:

- i. 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,
- ii. a condition of mental impairment or a developmental disability,
- iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- iv. a mental disorder, or
- v. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

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Provision of Goods and Services

SGCC will use reasonable efforts to ensure its practices and procedures are consistent with the following principles:

- Our goods and services will be provided in a manner that respects the dignity and independence of people with disabilities.
- The provision of goods and services will be integrated, to the extent possible, to enable a person with a disability to obtain, use or benefit from our goods and services.
- People with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from our goods and services.
- We will ensure that our staff is familiar with various assistive devices that may be used by customers with disabilities while accessing our premises and obtaining, using or benefiting from our goods and services.

Service Animals and Support Persons

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

We welcome people with disabilities who require support persons or service animals.

People accompanied by a support person will be allowed to have that person accompany them on our premises and will not be prevented access to that support person.

SGCC may require a person with a disability to be accompanied by a support person while on the premises, only if a support person is necessary to protect the health or safety of the person with a disability or others on the premises.

Service animals are allowed on the parts of our premises that are open to the public.

Notice of Temporary Disruptions

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, SGCC 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. The notice will be placed at all public entrances.

Staff Training

SGCC will provide training to employees, who deal with the public and all employees and volunteers who participate in developing SGCC policies, practices and procedures governing the provision of goods and services to members and guests or other third parties.

This training will be provided to new employees through orientation and to existing employees complete with a training component. This Policy, procedures, updates, and changes will be posted on our communication boards.

Training will include:

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- A review of the Accessibility for Ontarians with Disabilities Act, 2005, the requirements under Ontario Regulation 429/07 and requirements of the accessibility standards under Ontario Regulation 191/11.
- The Human Rights Code as it pertains to people with disabilities.
- Instruction on how to interact and communicate with people with various types of disabilities.
- Instruction on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- Instruction on how to use equipment provided by SGCC that may help with the provision of goods and services to a person with a disability.
- What to do if a person with a disability is having difficulty in accessing SGCC's premises.
- A review of this Policy.
- On-going training for all staff when any updates and changes in policy are made. SGCC will keep a record of the training it provides.

Feedback

The ultimate goal of this Policy is to meet goods and service delivery expectations while responding to the requests of individuals with disabilities. Comments on how well SGCC is meeting those expectations are welcome and appreciated. Customers can expect to hear back within 5 business days.

Feedback about this Policy or its implementation can be submitted to:

Contact name: Rose Rockbrune
Email: rrockbrune@scarborogcc.com
Telephone: (416) 266-4546,
Mailing address: Attn: Controller
 321 Scarborough Golf Club Road
 Toronto, ON
 M1J 3H2

Notification

SGCC will notify the public that our documents related to accessible customer service, are available upon request by posting a notice in the following location(s):

- On SGCC website
- Communication boards

Website

SGCC will ensure that our website, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA by July 31, 2021 (excluding success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded)).

Multi-Year Accessibility Plan

SGCC will develop, maintain, and document an Accessibility Plan outlining SGCC's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on SGCC's website. Upon request, SGCC will provide a copy of the

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Accessibility Plan in an accessible format taking into account a person's particular disability.

Employment Standards

SGCC will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

SGCC will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, SGCC will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, SGCC will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

SGCC will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, SGCC will consult with the employee to provide, or arrange for the provision of, Accessible Formats and Communication

Supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an Accessible Format or Communication Support, SGCC will consult with the employee making the request.

Workplace Emergency Response Information

SGCC will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if SGCC is aware of the need for accommodation due to the employee's disability. SGCC will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, SGCC will, with the consent of the employee, provide the workplace emergency response information to the person designated by SGCC to provide assistance to the employee.

SGCC will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs, or plans are reviewed.

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Documented Individual Accommodation Plans

SGCC will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding Accessible Formats and Communications Supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

Return to Work Process

SGCC will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps SGCC will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).

Performance Management, Career Development and Advancement & Redeployment

SGCC will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Accessibility Standards for our Facilities

SGCC is committed to designing our facilities to be free from barriers and accessible to all people we serve. SGCC will comply with the Design of Public Spaces Standards with respect to public spaces that are newly constructed or redeveloped in accordance with the requirements under Ontario Regulation 191/11.

Questions about this Policy

This Policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications, and employment.

If anyone has a question about this Policy, or if the purpose of the Policy is not understood, an explanation can be provided by contacting Human Resources in one of the ways listed above under the Feedback section.

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