

## **INTEGRATED ACCESSIBILITIES STANDARDS POLICY**

### **BACKGROUND:**

This Integrated Accessibilities Standards Policy ("**Policy**") has been established to meet the requirements of the Integrated Accessibilities Standards (Regulations 191/11) ("**IASR**") set forth under the *Accessibilities for Ontarians with Disabilities Act, 2005* ("**AODA**").

The *IASR* establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and transportation. The requirements under the *IASR* are not a replacement or substitution for the requirement of the Ontario *Human Rights Code* nor does it limit any obligations owed to person with disabilities under any other legislation.

### **PURPOSE:**

The purpose of this Policy is to define the requirements and process for compliance with the *IASR*, by Holy Sweet Inc., (and its affiliates companies located in Ontario as may exist from time to time) (collectively referred to as the "**Organization**").

### **APPLICATION AND SCOPE:**

This Policy applies to anyone dealing with members of the public or other third parties on behalf of the Organization, whether the person is an employee (whether full-time or part-time, temporary or permanent) and all individuals paid by or under contract with the Organization including but not limited to consultants and independent contractors, agents, volunteers or otherwise.

### **INTEGRATED ACCESSIBILITY STANDARDS COMMITMENT:**

The Organization strives to meet the needs of its employees and customers with disabilities and is working hard to remove and prevent barriers to accessibility. Where it is not possible to remove barriers, the Organization will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner.

The Organization is committed to fulfilling our requirements under the *AODA* and is guided by its core principles, including dignity, independence, integration and equal opportunity. This accessibility plan outlines the steps the Organization is taking to meet those requirements and to improve opportunities for people with disabilities. This Policy should be read in conjunction with the Organization's multi-year accessibility plan ("**Accessibility Plan**"), which outlines the specific measures taken by the Organization to achieve compliance with the requirements under the *AODA* and its regulations.

### **DEFINITIONS:**

"**Accessible Formats**" means formats that are an alternative to standard formats and are accessible to persons with disabilities. Accessible formats may include, but are not limited to,

large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**“Barrier”** means anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

**“Career Development and Advancement”** includes providing additional responsibilities within an employee’s current positions and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level of the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.

**“Communication Supports”** means supports that persons with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**“Disability”** means:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limited the generality of the foregoing, includes diabetes, mellitus, epilepsy, a brain injury, any degree of paralysis, amputations, lack of physical co-ordinations, 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 Insurance Act, 1997*.

**“Feedback”** means any comments, compliments, suggestions or complaints provided to the Organization by its customers.

**“Internet Website”** means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier and is accessible to the public.

**“Kiosk”** means an interactive electronic terminal including a point of sale device, intended for public use.

**“Performance Management”** means activities related to assessing and improving employee performance, productivity and effectiveness, with the goas of facilitating employee success.

**“Redeployment”** means the reassignment of employees to other department or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

## **INTEGRATED ACCESSIBILITY STANDARDS GENERAL REQUIREMENTS:**

### Multi-year Accessibility Plan

The Organization will maintain a multi-year Accessibility Plan outlining its phased strategy to address the current and future requirements of the *AODA* and the *IASR*.

The Organization will review and update the Accessibility Plan at least once every five (5) years, and will post the Accessibility Plan on its website. Upon request, the Organization will provide a copy of the Accessibility Plan in an accessible format.

### Self-Service Kiosks:

The Organization will have regard to accessibility features when designing, procuring or acquiring self-serve kiosks, except where not practicable to do so.

### Reporting

The Organization will file an accessibility report regarding its compliance with the *IASR*, annually or at such other times as specified under the *AODA*. All filed accessibility reports will be made available to the public, upon request.

## **TRAINING EMPLOYEES AND VOLUNTEERS:**

The Organization will ensure that training is provided on the requirement of the *IASR* as set out in this Policy and will continue to provide training on the Ontario *Human Rights Code* as it pertains to person with disabilities, to:

- All of its employees and volunteers;
- All persons who participate in developing the Organizations’ policies regarding the provision of Organization services; and
- All other persons who provide goods, services or facilities on behalf of the Organization.

The training will be appropriate to the duties of the Organization’s employees, volunteers and other persons.

New employees will be trained as soon as practicable after assuming responsibilities of the job. Training record will be kept in the employee files.

Training will be updated in respect to any changes to the policies, practices or procedures relating to the *AODA*.

## **CUSTOMER SERVICE STANDARDS:**

The Organization 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 received the same value and quality
- Allowing customers with disabilities to do thing in their own ways, at their own pace when accessing the Organization's goods and/or 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 need when providing goods and/or services; and
- Communicating in a manner that takes into account a customer's disability.

### Telephone Services

The Organization is committed to providing fully accessible telephone service to all customers. The Organization will train its staff to communicate with customers over the telephone in plain language while speaking clearly and slowly. The Organization will also make its staff familiar with technologies intended for persons with disabilities. The Organization will offer to communicate with guests by email, fax, or letter if telephone communication is not suitable to their communication needs or is unavailable.

### Assistive Devices

An assistive device is one or more devices used by a person with a disability to him/her independently complete everyday tasks. Accessibility devices include mobile aids (e.g. wheelchairs and walkers), portable communication devices, headwands, hearing aids, and much more.

The Organization welcomes use of assistive devices by our customer to access our goods and/or services. We will ensure our associates are trained on how to interact with individuals using various assistive devise and how associated can provide alternative service methods.

### Billing/Invoices

The Organization is committed to providing accessible billing/invoices to all of our customer and third party business partners. The Organization will answer any questions customers may have about the content of the billing and we will be responsible for ensuring that the alternative formats are available upon request.

### Use of Service Animals and Support Persons

#### *Service Animals*

An animal is a service animal for a person with a disability if,

- (a) It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- (b) The person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Customers with disabilities who are accompanied by a service animal are welcome at all of the Organization's properties when accessing our goods and/or services unless the animal is otherwise excluded by law from the premises. If the animal is legally excluded from the premises, the Organization will provide alternative measures to enable the person to obtain, use or benefit from its services.

The Organization will ensure that all associates are properly training on how to interact with customer with disabilities and who are accompanied by a service animal.

### *Support Persons*

A Support person is an individual who accompanies a customer with disabilities to help the customer meet his or her communication, mobility, personal care or medical needs or to assist the customer in accessing goods and/or services. A customer with a disability who is accompanied by a support person will be allowed to enter the Organization's premises together with the support person, and will not be prevented from having access to the support person while on the premises.

All support persons are welcome at all of the Organization's properties. For any admission fees required of a support person, advanced notice will be provided.

The Organization will ensure that all associates are properly training on how to interact with customers with disabilities and who are accompanied by a support person.

### Notice of Temporary Disruption to Services

The Organization will provide customers with notice of a planned or unexpected disruption in services usually used by customers with disabilities. This notice will include the reason for disruption, its anticipated duration, as well as describe alternative facilities or services that may be available. This notice will normally be posted on a website and may also be posted on the premises, where appropriate in the circumstances.

### **INFORMATION AND COMMUNICATION STANDARDS:**

The Organization will create, provide and received information and communication in ways that are accessible to people with disabilities.

If the Organization determines that it is not technically feasible to convert the information or communication or that the technology to convert the information or communications is not readily available, the Organization will be obligated to provide the person that requires the information with an explanation as to why the information or communication are unconvertible; and a summary of the unconvertible information or communications.

## Feedback, Accessible Formats and Communication Supports

The Organization has established a feedback process to ensure customers with disabilities are able to provide us with feedback on our products and services. Feedback is always welcome and appreciated and can be submitted in the following formats: in person, by telephone, by mail, by email, or by website e-submission.

In addition, in accordance with the *IASR* the Organization will provide or arrange for accessible formats and communication supports for person with disabilities:

- Upon request in a timely manner that takes into account the person's accessibility need due to disability;
- At a cost that is no more than the regular costs charged to other persons;
- Consult with the person making the request to determine suitability of an accessible format or communication support; and
- Notify the public about the availability of accessible formats and communications.

## Accessible Emergency Information

If the Organization prepares emergency procedures, plan or public safety information and make the information available to the public, we shall provide the information in an accessible format or with appropriate communication support, as soon as practicable upon request.

## Website Accessibility

The Organization will ensure that its internet website and web content conform with the World Wide Web Consortium Accessibility Guidelines (WCAG) 2.1 initially a Level A and increasing to Level AA, except where it is impractical to do so.

## **EMPLOYMENT STANDARDS:**

The Organization is committed to fair and accessible employment practices. The Employment Standards building upon the existing requirements under the Ontario *Human Rights Code* in relation to how accessible through the entire employment cycle is provided.

## Recruitment

The Organization shall take the following steps to notify team members and the public about the availability of accommodations for applicants with disabilities as follows:

- During the recruitment process all job advertisements and postings will include our accessibility accommodations information, including alternate ways to apply and will advise on our commitment to providing accommodation to persons with disabilities.
- If a selected applicant requests accommodation, the Organization shall consult with the applicant and provide or arrange for the provision of suitable accommodations in a manner that takes into account the applicants accessibility needs due to disability.

- When making offers of employment, successful applicants will be notified of the Organizations policies for accommodating employees with disabilities.

### Informing Employees of Supports

The Organization will continue to inform its employees of its policies (and any updates) 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 or when there is a change in the existing policies.

### Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the Organization will consult with the employee to provide, or arrange the provision of, accessible formats and communication support for information that is needed to perform the employee's job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the Organization will consult with the employee making the request.

### Workplace Emergency Response Information

The Organization 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 the Organization is made aware of the employee's need for accommodation due to the employee's disability. The Organization will provide this information as soon as practicable after becoming aware of the employee's need for accommodation.

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

The Organization will review the individualized workplace emergency response information developed for the employee when the employee moves to a different location within the Organization, when the employee's overall accommodations needs or plans are reviewed, and when the Organization reviews its general emergency response policies.

### Documented Individual Accommodation Plans and Return to Work

The Organization has developed and put in place a process for developing documented Individual Accommodation Plans ("**IAP**") and return to work plans and processes for team members that have been absent due to a disability:

- The process for the development of an IAP includes the following:
  - The employee’s participation in the development of the IAP;
  - Assessment on an individual basis;
  - Identification of accommodations to be provided;
  - Timelines for the provision of accommodations;
  - The Organization may request an evaluation by outside medical or other expert, at its expense, to assist in determining accommodation and how to achieve accommodation;
  - Employees may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace, where the employee is not represented by a bargaining agent;
  - Steps to be taken to protect the privacy of the team member’s personal information;
  - Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
  - If denied, the reasons for denial are to be provided to the employee;
  - The means for providing the IAP in a format that takes into account the employee’s accessibility needs due to disability;
  
- The IAP shall:
  - If requested, include any information regarding accessible formats and communication support provided, as described above and in section 26 of the *IASR*;
  - If required, include individualized workplace emergency information, as described above and in section 27 of the *IASR*;
  - Identify of any other accommodation that is to be provided.

### Performance Management, Career Development and Advancement & Redeployment

The Organization 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 opportunities to employees, or when redeploying employees.

In accordance with the *IASR*, the Organization will take the following steps to ensure that the accessibility needs of team members with disabilities are taken into account if we are using performance management, career development and redeployment processes:

- Review internal policies and procedures to ensure they are in compliance with the *IASR*;
- Take into account the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans when:
  - Assessing performance
  - Managing career development and advancement, including notification of the ability to provide accommodations on internal job postings
  - Redeployment is required

### **Public Spaces:**



The Organization shall incorporate accessibility into public spaces on its premises that are newly constructed or redeveloped on and after January 1, 2017 as follows:

- We will ensure that we follow the existing requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment) for service related elements such as service counters, queuing lines and waiting areas.
- We shall also provide maintenance and restoration of public spaces by ensuring procedures are in place for a preventative and emergency maintenance of accessible element in public spaces and that procedures are in place for dealing with temporary disruptions when accessible elements required under this section are not in working order.

## **Compliance**

Compliance with this Policy is mandatory and any violations of this Policy will be treated seriously and may result in disciplinary action, up to and including termination of employment or termination of contractual relationship and/or legal action, as applicable, depending on the severity of the incident.

## **Related Documents:**

Available upon request. Contact: [aoda@sweetjesusicecream.com](mailto:aoda@sweetjesusicecream.com)

- Multi-Year Accessibility Plan
- Customer Service Policy
- Plan to Deliver Accessible Customer Service
- Customer Feedback Policy

This document is available in alternate formats upon request to:

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