



Accessibility for Ontarians Policy

Intent

This policy is intended to meet the requirements of the Government of Ontario's Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA"), specifically the Accessibility Standards for Customer Service, Ontario Regulation 429/07 ("Customer Service Standards") and the Integrated Accessibility Standards Regulation, Ontario Regulation 191/11 ("IASR"), including Information and Communications and Employment.

This policy 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 Marsland Centre Limited shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

- a) This policy applies to the provision of goods and services at the premises owned and operated by Marsland Centre Limited.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Marsland Centre Limited including when the provision of goods and services occurs off premises of Marsland Centre Limited such as in: delivery services, vendors, drivers, catering and third party marketing agencies.
- c) The section of this policy that addresses the use of guide dogs, service dogs and service animals that take place at premises owned and operated by Marsland Centre Limited
- d) This policy shall also apply to all persons who participate in the development of Marsland Centre Limited's policies, practices and procedures governing the provision of goods and services to tenants and customers of the public and third parties.

Statement of Commitment

Marsland Centre Limited is committed to providing a welcoming, accessible and inclusive environment that is respectful of the dignity and independence of all people. Our policies will support identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with Marsland Centre Limited. Additionally, we will strive to ensure that the AODA, its regulations and integrated standards are observed in a timely manner.

Confidentiality of Information

Personal information concerning an individual's disability cannot and will not be released without written consent of the individual, and will be managed in a manner that is consistent with the Freedom of Information Guidelines and Personal Information Protection Guidelines, where appropriate. Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required. Definitions applicable to this policy are outlined below.

Definitions

Accessible Format: a format of communication that may include but is not limited to large print, recorded audio and electronic formats, Braille or other formats useable by persons with disabilities.

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 that customers bring with them such as a wheelchair, walker, or personal oxygen tank that might assist hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Barrier: Includes 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, policy or practice.

Communication Supports: Include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Customer: Includes tenants, members, vendors, partners and any other third parties with whom Marsland Centre Limited directly interacts in Ontario.

Disability: The term disability as defined by the AODA, 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 the generality of the foregoing includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of coordination, 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 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 under the Workplace Safety and Insurance Act, 1997

Guide Dog: Is a highly trained working dog that has been trained at one of the facilities listed in the 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 the Customer Service Standards, 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 a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog: As reflected in the 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 a letter from a physician or nurse confirming that the person requires a service dog.

Support Person: As reflected in the Customer Service Standards, 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.

1. Accessible Customer Service Policy

Providing Goods & Services to People with Disabilities

Under the AODA, Ontario Regulation 429/07 entitled the 'Accessibility Standards for Customer Service' came into effect on January 1, 2012. This regulation establishes standards specific to customer service for the private sector organizations that provide goods and services to tenants and customers of the public or third parties.

Marsland Centre Ltd is Committed to Excellence in Serving All Tenants and Customers, Including People with Disabilities.

General Principles

In accordance with the Customer Service Standards, this policy addresses the following:

- A. The Provision of Goods and Services to persons with Disabilities.
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback

G. Training

H. Notice of Availability and Format of Required Documents

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

Marsland Centre 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 all tenants and customers receive the same value and quality
- Allowing tenants and customers with disabilities to do things in their own way, 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 tenants and 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 tenant or customer's disability

B. *The Use of 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 Marsland Centre Limited.

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 access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a tenant or customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the tenant and/or customer and business. Or where elevators are not present and where an individual requires assistive devices for the purpose of mobility, service will be provided in a location that meets the needs of the customer.

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. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas

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

Other types of service animals are not permitted into food service areas due to the health Protection and Promotion Act, Ontario Regulation 562 Section 60.

Exclusion Guidelines

If a guide dog, service animal or guide dog is excluded by law (see applicable laws below), Marsland Centre Limited will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee.)

Applicable Laws

The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold, or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of services animals are not included in this exception.

Dog Owner's Liability Act, Ontario: If there is a conflict between a provision of this Act or of the regulation under this or any other Act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

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, Marsland Centre Limited may request verification from the customer.

Care and Control of the Animal

The customer who is accompanied by a guide dog, service dog and or service animal is responsible for maintaining care and control of the animal at all times.

Allergies

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Marsland Centre Limited will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on any of our premises.

There may be times where seating and availability prevent the tenant or customer and support person from sitting beside each other. In these situations, Marsland Centre Limited will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the tenant or customer, prior to any conversation where confidential information might be discussed.

Admission Fees

If payment is required by a support person for admission to the premises, Marsland Centre Limited will ensure notice is given in advance by posting notice of admission fees for support persons where Northfield Racquet and Fitness Club fees are posted.

E. Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for tenants or customers with disabilities, the disrupted location will notify our tenants and/or customers promptly.

This clearly posted notice will include:

- Goods or services that are disrupted or unavailable
- Information about the reason for the disruption
- Its anticipated length of time
- A description of alternate facilities or services, if available.

Notification Options

When disruptions occur, Marsland Centre Limited will provide notice in a practical manner for the situation which may include one or more of the following options

- Posting notices on Facebook or Twitter
- Sending out an email blast
- Posting notices at all building entrances at the location of disruption
- Verbally notifying tenants and or customers when they are entering the building
- Verbally notifying tenants and or customers via paging announcements on the day of the disruption
- The notice will be placed on the Main entry door at the location where the disruption to services or facilities has or will occur.

F. Feedback Process

Marsland Centre Limited shall provide tenants and or customers with the opportunity to provide feedback on the service provided to tenants or customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available at reception at Marsland Centre Limited or at Northfield Racquet and Fitness Club. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written or email) will be available upon request.

Submitting Feedback:

FEEDBACK FORMS CAN BE COMPLETED AND SUBMITTED WITHIN MARSLAND CENTRE OR NORTHFIELD RACQUET AND FITNESS CLUB. Forms are available at the reception of Marsland Centre Limited or Northfield Racquet and Fitness Club.

Feedback can also be provided via phone, email or letter to:

Marsland Centre Limited
Attention: Melanie Marsland
1201-20 Erb Street West
Waterloo, ON N2L 1T2
Phone: 519-886-2940
Melanie@marsland.on.ca

Customer who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Marsland Centre Limited employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted. Feedback and /or responses will be delivered in a format that is accessible to the customer.

G. Training for Staff

Marsland Centre will provide training to employees, volunteers and others at all locations, who deal with the public or other third parties on their behalf at all locations.

Individuals in the following positions will be trained:

Owners

Managers

Food & Beverage Staff

Accounting and Administration Staff

Front Desk Staff

Tennis & Squash Instructors

Group Fitness Instructors & Personal Trainers

Maintenance & Cleaning Staff

Leasing Agents

Training Provisions:

As reflected in Ontario Regulation 429/07, 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.
- Instructions on how to interact and communicate with people with various types of disabilities who:
 - Use an assistive device;
 - Require the assistance of a guide dog, service dog or other service animal;
 - Require the use of a support person (including handling of admission fees)
- Instructions on how to use equipment and devices that are available on our premises.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- Marsland Centre Limited's policies, procedures and practices pertaining to providing accessible customer service to tenants and/or customers with disabilities.

Training Schedule

Marsland Centre Limited will provide training. Training will be provided to new employees, volunteers, agents and/or contractors who deal or act on our behalf during the orientation and onsite training programs. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training

Marsland Centre Limited will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

H. Notice of Availability and Format of Documents

Marsland Centre Limited shall notify tenants and customers that the documents related to the Customer Service Standards are available upon request in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Marsland Centre Limited and/or on the website of Marsland Centre and Northfield Racquet & Fitness Club.

Administration

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

Marsland Centre Limited
Attention: Melanie Marsland
1201-20 Erb Street West,
Waterloo, ON N2L 1T2
Phone: 519-886-2940
Melanie@marsland.on.ca

2. Integrated Accessibility Standards Regulation (IASR)

Under the AODA, Ontario Regulation 191/11, entitled 'Integrated Accessibility Standards Regulation' (IASR) provides standards for private organizations to increase accessibility for persons with disabilities. The two regulations that apply to Marsland Centre Limited are: Information and Communications and Employment.

A. INFORMATION & COMMUNICATIONS STANDARD

Feedback

The company will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision, of accessible formats and communication supports upon request. Contact information for feedback purposes is found at the end of this policy.

Accessible Formats and Communication Supports

Upon request, the company will provide or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessibility format or communication support. We will also notify the public about the availability of accessible formats and communications supports.

Emergency Procedure, Plans and Public Safety Information

When the company makes emergency procedures, plans or public safety information available to the public, we provide the information in an accessible format or with the appropriate communication supports as soon as practicable upon request.

Accessible Websites and Web Content

The company will ensure that the internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A except where it is impracticable.

B. EMPLOYMENT STANDARDS

Recruitment

The company 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

The company will notify job applicants, when they are individually selected to participate 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, the company 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 of Successful Applicants

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

Informing Employees of Supports

The company will 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, the company 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 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 company will consult with the employee making the request.

Workplace Emergency Response Information

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

Where the employee requires assistance, the company will, with the consent of the employee, provide a workplace emergency response information to the person designated by the company to provide assistance to the employee. The company will review the individualized workplace emergency response information when the employee moves to a different location in the company, when the employee's overall accommodation needs or plans are reviewed and when we review the company's general emergency response policies.

Documented Individual Accommodation Plans

The company will maintain a written process for the development of documented individual accommodation plans for employees with disabilities that will include all elements required by the Regulation. If requested, information regarding accessible formats and communications supports provided will also be included in the individual accommodation plans. 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

The company will maintain a documented return to work process for its employees who have been absent from work due to disability and who require disability related accommodations in order to return to work. The return to work process outlines the steps we will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

Performance Management, Career Development and Advancement and Redeployment

The company 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.

Multi- Year Accessibility Plan

Marsland Centre Limited has developed a multi- year plan which details our strategy and the steps we will undertake to meet requirements set out in this policy and to ensure compliance with the AODA legislation. The accessibility plan will be reviewed and updated at least once every five years. This plan can be provided in an accessible format as requested.

Training

The company will ensure that training is provided to all employees and those who participate in developing Marsland Centre Limited's policies on the requirements of the Integrated Accessibility Standards of Information and Communication and Employment, and on the Ontario Human Rights Code, as it pertains to persons with disabilities.

This training will be provided to new hires as part of the orientation and onboarding process and within the first 30 days of employment. For all others,

training will take place as soon as it is practicable and when changes are made to the plan. Upon completion, Marsland Centre Limited will keep a record of the training provided including the dates on which the accessibility training took place.

The company will require that its contractors and all other persons that provide services on behalf of the company are required to maintain records of the training provided to their staff, including the dates on which training is provided and the number of individuals to whom it is provided. The company will require that contractor training records be available upon request.

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

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 wishes to provide feedback on accessibility at the company, please contact:

Melanie Marsland

VP, Marsland Centre Limited

Phone: 519-886-2940

Email: melanie@marsland.on.ca

Fax: 519-886-5209

Acknowledgement & Agreement

I, _____ acknowledge that I have read and understand the Accessibility for Ontarians Policy of Marsland Centre Limited. Further I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Employee Name: _____ Date: _____

Employee Signature: _____

Manager's Name: _____

Manager's Signature: _____

Referenced Documents:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Person's Rights Act
- Dog Owner's Liability Act
- Food Safety and Quality Act 2001, Ontario Regulations 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Human Rights Code