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## Accessibility for Ontarians with a Disability

Responsibility:	Human Resources Manager
Date of Original Policy:	December 1, 2011
Date of First Revision:	July 18, 2016
Date of Second Revision:	February 15, 2023
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### **Introduction**

The Accessibility for Ontarians with Disabilities Act (AODA) was passed into law in 2005. The purpose of the AODA is to achieve accessibility for Ontarians with disabilities on or before January 1, 2025 through the development, implementation and enforcement of accessibility standards. The AODA and its standards apply to White Oaks Conference Resort & Spa.

The Accessibility Standards for Customer Service (Ontario Regulation 429/07 or the “Standard”) are the first to be developed under the AODA.

Questions about this policy may be directed to the Director of Human Resources.

### **Policy**

White Oaks Conference Resort & Spa is committed to providing an environment that is accessible to persons with disabilities in a way that respects their rights to dignity, independence, integration, and equal opportunity.

### **General Principles**

White Oaks will strive to ensure that its’ policies, practices and procedures are consistent with the following core principals as outlined in the AODA.

**Dignity** – Goods and services are provided in a manner that is respectful to a person with a disability and does not diminish the person’s importance.

**Independence** – Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

**Integration** – Persons with disability can access all goods and services. They may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

**Equal Opportunity** – Service is provided to persons with disabilities in such a way that their opportunity to access goods and services is equal to that given to others.

### **Scope**

This policy applies to team members, volunteers, agents and/or contractors who are in contact with the general public or other third parties that act on behalf of White Oaks Conference Resort & Spa.

### **Definitions**

AODA means the *Accessibility for Ontarians with Disabilities Act, 2005* and its Regulations.

**Accessibility** means giving opportunities to people of all abilities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, program, product, or environment.

**Accessible design** refers to products, devices, information, services, facilities, or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both “direct access” (i.e., unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.

**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.

**Accommodation** refers to the obligation to eliminate the disadvantage, to the point of undue hardship, caused by barriers that exclude individuals or groups protected under the *Ontario Human Rights Code* from participating in all aspects of their employment and/or their receipt of services on the basis of disability.

**Disability means** – the term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:

- 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 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 and Insurance Act, 1997.

**Assistive devices** are any technical aids, communication devices or medical aids that are used to increase, maintain or improve the experience of individuals with disabilities. Assistive devices include, but are not limited to, wheelchairs, walkers, white canes, prosthetic limbs, note taking devices, portable magnifiers, recording machines and electronic communication devices.

**Barriers** means anything that keeps a person with a disability from participating in all aspects of society. Examples of barriers include:

- **Physical and architectural barriers:** occur in the environment and prevent access for people with disabilities. Examples include narrow doorways, stairs, dim lighting, or high glare surfaces.
- **Information or communications barriers:** arise when a person with a disability cannot easily receive and/or understand information that is available to others (e.g., publications that are not available in large print, digitally, Braille or other accessible formats).
- **Technological barriers:** occur when technology or the way it is used does not meet the needs of people with disabilities (e.g., a website that does not support screen reading software).
- **Attitudinal barriers:** may result in people with disabilities being treated differently than people without disabilities (e.g., a receptionist who talks to an individual's support person rather than the individual with a disability); or
- **Systemic barriers** in policies, practices and procedures result in people with disabilities being treated differently than others or sometimes excluded altogether.

**Service Animal** – the Regulation defines a “service animal” as an animal for a person with 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 recognized medical institution or association by the AODA confirming that the person requires the animal for reason relating to the disability; or
- If the person provides a valid identification card or training certificate from a recognized service animal training school.

**Support Persons** - 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.

#### **Service Animals:**

White Oaks is committed to welcoming people with disabilities who are accompanied by a service animal. Service animals are allowed on the parts of our premises that are open to the public.

Ontario Regulation 429/07 of the Accessibility for Ontarians with Disabilities Act, 2005, subsection 4(9) states:

“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 recognized medical institution or association by the AODA confirming that the person requires the animal for reason relating to the disability; or
- If the person provides a valid identification card or training certificate from a recognized service animal training school.

A service animal can be easily identified through visual indicators, such as when it wears a “uniform” such as a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

Persons with disabilities accompanied by a service animal may access White Oaks Conference Resort & Spa and may keep the animal with them except where excluded by law.

Where the service animal is excluded by law, other options are to be made available to ensure the person with disability has access to the goods and services of White Oaks. Where the service animal may affect the health and safety of other persons, White Oaks team members will use other measures to ensure the access of goods and services.

Service animals are usually well trained and well-behaved. In the unlikely event that this is not the case, service animals may be removed from the premise after discussion with the User for any one of the following reasons:

- i. disruptive or aggressive behaviour; such as growling or other signs of threatening or aggressive behaviour.  
**PLEASE NOTE:** If the dog guide in this case is a Seizure Response Dog – this is an expected response from the animal when assisting the person with a disability.
- ii. causing damage; including causing damage to any person or property
- iii. poor health, such as a contagious disease where the animal risks spreading the disease to others.

In situations where a person who requires a service animal may be in contact with a person who is allergic to or fearful of animals, White Oaks will make reasonable attempts to accommodate both persons while respecting their needs.

#### Exclusions of Service Animals

There are exceptions to the Customer Service Standard requirements:

- Ontario Regulation 562 under the Health Protection and Promotion Act states that animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. **The regulation makes an exception for service animals, which are permitted where food is normally served, sold or offered for sale.** Other types of service animals are not permitted in these areas.

#### Use of Assistive devices:

Persons with disabilities may use their own assistive devices as required when accessing services at White Oaks. In cases where the assistive device presents a safety concern or where a barrier may exist, other reasonable measures may be used to ensure the access of services.

#### Use of Support Persons

Persons with disabilities accompanied by a support person may access White Oaks Conference Resort & Spa.

In order to determine if a support person is required for health and safety reason, White Oaks will:

- consult with the person with a disability to understand their needs.
- consider health or safety reasons based on the available evidence.
- determine if there is any other reasonable way to protect the health or safety of the person or others on the premises. In such a situation, White Oaks will waive the admission fee or fare for the support person, if one exists.

Where the assistance of a support person is required by a person with a disability, they must not be prevented from having access to the support person.

If payment is required by a support person for admission to the premise, White Oaks will ensure that notice is given in advance, in respect to the support person.

When addressing a person with a disability who is accompanied by a support person, team members will communicate directly with the person with a disability. If confidential/personal information is being exchanged and the person with a disability request to discuss the information in private, the request will be accommodated, and the support person asked to wait in another area.

### **Notice of Temporary Disruption**

White Oaks Conference Resort and Spa will provide with notice in the event of a planned or unexpected disruption in the facilities or services usually used by the people with disabilities. The notice will include

- The reason for the disruption
- The anticipated duration of the disruption
- Information identifying alternative facilities or services, if any, that may be available.

White Oaks shall provide guests with notice in the event of a planned disruption within White Oaks or services usually used by people with disabilities.

In the event of an unexpected disruption, White Oaks will make reasonable efforts to contact any known guests with a disability that may be impacted by the disruption within White oaks or services usually used by people with disabilities.

The notice will be placed at all visible places (e.g., public entrances and service counters on our premises and posted on the White Oaks website). When posted notices are used, there must be a plan to convey the information to people who may not see or cannot understand the signage.

### **Training**

White Oaks Conference Resort and Spa will provide training to all their team members and volunteers will be trained on accessible customer service and how to interact with people with disabilities.

### **Training Provisions:**

The training will consist of 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.
- 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 (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- White Oaks Conference Resort & Spa policies, procedures and practices pertaining to providing accessible customer service to guests with disabilities.

The Human Resources Department will retain all the training records.

### **Feedback Process**

The ultimate goal of White Oaks Conference Resort & Spa is to meet and surpass customer service expectations while serving customers with disabilities. We welcome any and all comments regarding our services. White Oaks will provide or arrange accessible formats and communication supports on request.

The feedback process will allow for comments in person, email, by telephone or in writing or using any other accessible formats available (for example - accessible formats such as large print or available compatible communication supports). All feedback will be directed to the:

Mail: 253 Taylor Road, SS4  
NOTL, ON  
L0S 1J0

Contact Person: Julie Cassidy  
Telephone: 905-704-5672  
Fax: 905-688-5556  
Email Address: [jcassidy@whiteoaksresort.com](mailto:jcassidy@whiteoaksresort.com)

### **Format of Documents**

If White Oaks Conference Resort & Spa is asked to provide a copy of the AODA policy to a person with a disability, White Oaks will do so in a timely manner and the document, or the information contained in the document will be provided in a format that takes into account the person's disability.

Further interpretation of this policy is the responsibility of the Human Resources Manager. The Company reserves the right to make, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time. Exceptions can be made to this policy as deemed necessary by the Chief Executive Officer.

