

Title: ACCESSIBILITY POLICY			Date of Issue: Dec 2023
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Location:	Office/ Site Docs	Reviewed By	Rebecca Yates JHSC

PURPOSE

To identify and define M&G Millwrights Limited’s commitment to accessibility through general practices, information and communication standards, employment standards, training, and customer service. This policy outlines our plan for implementation. It is posted in conspicuous spaces in our offices.

LEGISLATION:

Accessibility for Ontarians with Disabilities Act, 2005
 Ont. Reg 429/07
 Ont. Reg 191/11

SCOPE

All employees are expected to participate and comply with this Policy.

DEFINITIONS

- Accessibility policies The formal rules an organization puts in place to achieve its accessibility goals
- Accessibility plan The steps an organization will take to prevent and remove barriers to accessibility and when it will do so

STATEMENT OF COMMITMENT

M&G Millwrights Limited (M&G) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirement under the Accessibility of Ontarians with Disabilities Act and Ontario’s accessibility laws.

M&G is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

M&G understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human rights Code or obligations to people with disabilities under any other law.

M&G is committed to excellence in serving and providing goods or services to all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities.

POLICY

The policy outlines information regarding:

- training
- assistive devices
- information and communication
- service animals
- support persons
- notice of temporary disruption
- feedback process
- notice of availability of documents
- information and communication
- employment

TRAINING

We are committed to training all employees in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to people with disabilities.

In addition, we will train:

- All persons who participate in developing the organizations policies; and
- All other persons who provide goods and services on behalf of the organization

Training of our employees on accessibility relates to their specific roles and will be reviewed and scheduled by HR.

Training includes:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- Our policies related to the customer service standards.
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person

- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities. These include:
 - Reading the document out loud
 - Using large print
- What to do if a person with a disability is having difficulty in accessing our organization's goods, services, or facilities

We train every person as soon as practical after being hired and provide training in respect of any changes to the policies.

We maintain a record of the training provided. This includes the names of who attended and the dates of training. All employees must complete a review after 3 years.

ASSISTIVE DEVICES

People with disabilities may use their personal assistive devices when accessing our goods, services, or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities.

COMMUNICATION

We communicate with people with disabilities in ways that take into account their disability. This may include the following:

- Asking before you help
- For those with vision loss, identify yourself when you approach and speak directly to the customer.
- For those with hearing loss, make sure you are in a well-lit area where they can see your face and read your lips.
- Don't assume that a person who has difficulty speaking can't understand you.
- Don't touch or handle any assistance device without permission.

We will work with the person with disabilities to determine what method of communication works for them.

SERVICE ANIMALS

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. This is limited to the office.

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter, or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears 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

SUPPORT PERSONS

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

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, this organization name will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

NOTICE OF TEMPORARY DISRUPTION

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization 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.

Services/Facilities include:

- Access to the office at 1540 Floradale Rd

The notice will be made publicly available in the following ways:

- On our website
- On the office door

FEEDBACK PROCESS

M&G welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback may be provided in the following ways:

- Email
- Phone
- In print

All feedback, including complaints, will be handled in the following manner:

Complaints will be directed to the Office Manager by emailing mmacaulay@mgmill.com or phoning 519-669-5105. Customers can expect to hear back in 3 business days.

M&G ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

NOTICE OF AVAILABILITY OF DOCUMENTS

M&G notifies the public that documents related to accessible customer service, are available upon request by posting a notice in the following location(s)/way(s):

- Website
- Posted in the office

M&G will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

INFORMATION AND COMMUNICATIONS

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that considers their disability.

When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- in a timely manner, considering the person's accessibility needs due to disability; and
- at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- an explanation as to why the information or communications are unconvertible; and
- a summary of the unconvertible information or communications.

We notify the public about the availability of accessible formats and communication supports by: Posting it on our website.

We will also meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

DESIGN OF PUBLIC SPACES

M&G will meet accessibility laws when building or making changes to public spaces.

EMPLOYMENT

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring.

We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment.

We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability.

We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- information that is needed in order to perform the employee's job; and
- information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee’s disability.

We 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; and
- when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

CHANGES TO EXISTING POLICIES

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.

PLAN

Physical and architectural Plan	At M&G customers or third parties may come to the office to meet with project managers and/or foreman, as well as to pay bills. In addition, they may drop off material at the shop.
	Examine the feasibility of adding a designated parking spot in front of the office.
	If required, hold the door open for customers.
	Meetings will take place on the main floor in the boardroom.
	Shop: Access to the shop is restricted. Customers will be met in the office.

Information and Communication	When asked M&G will provide information about our organization in an accessible format. We notify the public that this is available on our website.
Website	Our website meets meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario’s accessibility laws
Documents (ex: quotes)	Are created in Microsoft Word and emailed as a PDF using Font 12. Further accommodation can be made upon request.

<p>Employment</p>	<p>Accommodation will be provided in all parts of the hiring process and throughout the employment relationship as required under M&G’s Accommodation Policy. Applicants and employees need to make their needs known in advance.</p>
<p>Current Employees</p>	<p>In 2024, all current employees will have access to M&G’s Health and Safety Policies through Site Docs. Upon request they will be provided in additional formats.</p> <p>The following policies will be created: Accommodation Policy, Attendance Policy, and the Return-to-Work Policy.</p> <p>As each policy is rolled out workers will be trained on the policy and receive a copy.</p> <p>After the initial roll out, each of the three policies will be reviewed annually through toolbox talks.</p> <p>Prior to 2023 training took place through OSG. As of November 2023, all initial training is provided through Access Forward as soon as practical. It includes:</p> <ul style="list-style-type: none"> • All employees are trained in the Customer Service Standard. • In addition, employees that work in the office and top management (as well as others as identified by HR) must complete the information and communication standard. • HR and top management must complete the Employment Standard <p>Every three years a general review will take place.</p>
<p>New Employees</p>	<p>As of November 2023:</p> <p>All new workers receive training in customer service through Access Forward.</p> <p>All new workers receive Disability and Human Right brochure upon hire.</p> <p>In 2024:</p> <p>All new workers receive a copy of the Accommodation policy.</p> <p>Applicants will be notified of available accommodation policies and practices throughout the hiring process.</p>

	<p>During the orientation process new workers have the opportunity to discuss one-on-one the Accommodation Policy, Human Rights and the rights of the worker.</p>
<p>All Employees</p>	<p>In 2024: Accessibility requirements are considered for organizational events.</p> <p>Update and review job descriptions on a regular basis.</p> <p>Job descriptions are written taking into consideration Bona Fide Occupational Qualification.</p> <p>Ensure all policies respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities. Including the Attendance Policy, Return-to Work Policy, and Accommodation Policy.</p> <p>Health and Safety/Policy Training will be presented using large fonts, high contrast colours and clean layout. A visual description of the slides is provided when making a presentation. Descriptions or tags will be used for pictures.</p>

ROLES AND RESPONSIBILITIES:

The Top Management/Project Manager will:

- Ensure that compliance with all applicable legislation and regulations is maintained.

HR Coordinator will:

- Review and schedule training for workers
- Ensure Health and Safety Training is presented in an accessible format.
- Ensure job descriptions are reviewed and meet job requirements as well as BFOQ.
- Ensure accommodation is offered through all stages of the hiring process.

Shop/Road Foremen and Workers will:

- Follow M&G’s Accessibility Policy
- Complete training as requested.

JHSC:

- Review the Policy on an annual basis.

COMMUNICATION:

This policy will be communicated through one or more of the following ways:

- Tool box talks
- Safety Bulletin Board
- Email

EVALUATION:

- Quiz

EFFECTIVENESS:

- The Accessibility Policy and Plan will be reviewed every 5 years (or as needed). The following items will be evaluated:
 - Customer Feedback
 - Physical Structures
 - Website
 - Employment Policies
 - Information and communication practices
 - training
- In order to uphold M&G’s commitment to accessibility, we will avoid creating new barriers for people with disabilities when planning new facilities, renovating, buying computer systems or other equipment, launching websites, etc...

FORMS:

Accessibility Policy Review Form

REFERENCE MATERIAL:

Accessibility for Ontarians with Disabilities Act, 2005	Ont. Reg 191/11	Ont. Reg 429/07
Access Forward		