

# CLUBLINK

## **Accessibility for Ontarians with Disabilities Act (AODA) Customer Service and the Integrated Standards Policy**

*Revised June 2021*

- 1. PURPOSE AND POLICY STATEMENT**
- 2. APPLICATION**
- 3. DEFINITIONS**
- 4. CORE PRINCIPLES OF THE POLICY**
- 5. PROVIDING GOODS AND SERVICES TO PEOPLE WITH DISABILITIES**  
*Ontario Regulation 429/07*
- 6. INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)**  
*Ontario Regulation 191/11*
- 7. CUSTOMER FEEDBACK PROCEDURE**
- 8. MATERIALS/DOCUMENTATION**

## **1. PURPOSE AND POLICY STATEMENT**

The purpose of this policy is to outline the requirements developed under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), specifically Ontario Regulation 429/07, Customer Service Standard and Ontario Regulation 191/11, the Integrated Accessibility Standards (IASR). This policy will provide the framework for compliance with the requirements.

ClubLink is committed to implementing, maintaining and enhancing accessibility with respect to employment, and the use of all goods and services, for all persons with disabilities, in a timely manner.

ClubLink shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities;
- Persons with disabilities will be given equal opportunity in the employment cycle and to obtain, use and benefit from goods and services.

## **2. APPLICATION**

This policy shall apply to every person who deals with members of the public or other third parties in the province of Ontario on behalf of ClubLink Corporation ULC (ClubLink), whether the person does so as an employee, agent, volunteer or otherwise.

### **Management Responsibilities**

It is the responsibility of managers and supervisors to ensure that all employees conduct themselves in an appropriate manner and abide by the Company's policies, procedures and practices. Additionally, managers and supervisors have the responsibility to maintain a professional work environment, and to ensure that it is conducive to, and encourages, appropriate employee behaviors and conduct.

### **Employee Responsibilities**

It is the responsibility of all employees to at all times conduct themselves in an appropriate manner and abide by all of ClubLink's policies, procedures and practices.

## Responsibility for Administration

All levels of Management are responsible for the effective administration/application and management of the policy.

### 3. DEFINITIONS

**Assistive Device** - Any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living.

**Disability** – “disability” means,

- 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 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 and Insurance Act, 1997.

**Integrated Accessibility Standard Regulation (IASR)** – A combination of three standards: [information and communications](#), [employment](#), and [transportation](#), in addition to ‘General’ requirements.

**Service Animal** – Any animal individually trained to do work or perform tasks for the benefit of a person with a disability.

**Support Person** – Any person whether a paid professional, volunteer, family member or friend that accompanies a person with a disability in order to help with communications, personal care or medical needs or with access to goods or services.

**Accessible Formats** – Providing information in a way that takes into account the preferred and most effective method of communication for a person with a disability including large print and Braille.

**Communication Supports** – Other supports that facilitate effective communication including captioning, assistive listening devices and American Sign Language.

“**We**”, “**Our**” and “**Staff**” means ClubLink and its employees, volunteers, agents and contractors.

#### 4. CORE PRINCIPLES OF THE POLICY

We endeavor to ensure that the Policy and related practices and procedures are consistent with the following four (4) core principles:

- a) **Dignity** - Persons with a disability must be treated as valued customers as deserving of service as any other customer.
- b) **Equality of Opportunity** - Persons with a disability must be given an opportunity equal to that given to others to obtain, use and benefit from our goods and services.
- c) **Integration** - Wherever possible, persons with a disability must benefit from our goods and services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, goods and services will, to the extent possible, be provided in another way that takes into account the person’s individual needs.
- d) **Independence** – Goods and services must be provided in a way that respects the independence of persons with a disability. To this end, we will always be willing to assist a person with a disability but will not do so without the express permission of the person.

#### 5. PROVIDING GOODS AND SERVICES TO PEOPLE WITH DISABILITIES

##### *Ontario Regulation 429/07*

##### **Communication**

When communicating with persons with disabilities, all employees shall do so in a manner that takes into account the person’s disability (see the ‘Information and Communications Standard’ below for further details).

### **Assistive Devices**

A person with a disability is permitted to enter the premises with the device and to utilize the device, unless excluded by law.

Where excluded by law, an explanation must be provided and other arrangements explored in order to provide service.

### **Service Animals**

Persons with a disability may enter a premises, owned and/or operated by ClubLink, and be accompanied by their service animals unless the animal is excluded by law.

If a service animal must be excluded, we will explain to the person why this is the case and explore alternative ways to ensure their needs are met.

If a service animal is unruly or disruptive (jumping on people, biting, or other harmful behaviour) an employee may ask the person with a disability to remove the animal from the area or refuse access to goods or services. In this event, other reasonable arrangements to provide goods or services shall be explored with the assistance of the person with disability.

If it is not readily apparent that the animal is a Service Animal, ClubLink may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to their disability.

Staff will receive training on how to interact with persons with a disability accompanied by a Service Animal.

### **Support Persons**

A person with a disability may enter premises owned and/or operated by ClubLink with a Support Person and have access to the Support Person while on the premises.

ClubLink may require a person with a disability to be accompanied by a Support Person where it is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.

Staff will receive training on how to interact with persons with a disability who are accompanied by a Support Person.

ClubLink will provide advance notice to members of the public and/or third parties as to whether or not a fee will be charged for Support Persons who accompany a person with

a disability. Requirements with respect to fees for Support Persons, if any, will be documented on the ClubLink website under the fees section.

#### *Fees for Support Persons*

A fee will be charged for Support Persons who accompany a person with a disability, and who utilizes the services provided by ClubLink (i.e. plays golf). In this case, the regular fees will apply.

Support Persons accompanying a person with a disability who does not utilize any of the services provided by ClubLink (i.e. rides in the golf cart with the person they are assisting, but does not have golf clubs or play the game) will not be charged a fee.

#### **Notice of Temporary Disruptions**

In the event that a disruption in service is planned, and expected, notice of the disruption will be posted at the facility in a conspicuous location and will include the reason for the disruption, its anticipated duration and a description of any alternatives available.

In the event of an unexpected disruption in service, notice may be provided in a variety of ways, and will be done as quickly as possible.

#### **Training and Records**

ClubLink will provide online training, and ongoing training as required under the Act, to all persons to whom this Policy applies as well as to those persons charged with developing this Policy and related procedures and practices.

##### a) Content of Training: *Accessibility and Customer Service (AODA) Awareness*

###### i) Training will include:

- A review of the purpose of the Act and requirements of the Standard.
- A review of the Policy.
- How to interact and communicate with persons with various types of disabilities.
- How to interact with persons with a disability who use an Assistive Device or require the assistance of a Service Animal or Support Person.

- How to use equipment or devices available on ClubLink’s premises or otherwise provided by ClubLink that may help with the provision of goods or services to a person with a disability.
- What to do if a person with a disability is having difficulty accessing our premises and/or services.

ii) Assignment of online training

- Accessibility and Customer Service (AODA) Awareness: Part 1 – All Ontario employees
- Accessibility and Customer Service (AODA) Awareness: Part 2 – All Ontario employees
- Accessibility for Ontarians with Disabilities Act (AODA) Customer Service and the Integrated Standards Policy – All Ontario managers and supervisors

b) Timing of Training

Training will be provided to all persons to whom this Policy applies as soon as practicable after they have been assigned the applicable duties.

c) Documenting Training

Records of the training provided, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance the requirements of the Act.

## 6. INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) *Ontario Regulation 191/11*

### General

#### Accessibility Plan

A 2014-21 Accessibility Plan is posted on our employee website <http://myclubLink.ca> and is available on the public ClubLink website, [www.clublink.ca](http://www.clublink.ca). It outlines the actions that ClubLink has put in place and will put in place to eliminate barriers for persons with disabilities to meet the requirements of the regulation.

#### Accessible Emergency Information

Upon request, ClubLink is committed to providing our Members and guests with publicly available emergency information in an accessible way. We will also provide employees with disabilities with individualized emergency response information as required.

#### Training

ClubLink will provide training to all employees on the requirements of the Integrated Standard, the Human Rights Code as it pertains to persons with disabilities and details on ClubLink's policies and procedures related to the ISAR.

An online training module, **Accessibility Awareness Module: Part 2**, will be offered through <http://myclublink.ca>.

a) Training will include:

- AODA and the Standards
- The Ontario Human Right Code
- The Integrated Accessibility Standards Regulation (IASR)

b) Timing of Training

Training will be provided to all persons to whom this Policy applies as soon as practicable after they have been assigned the applicable duties.

c) Documenting Training

Records of the training provided, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of the Act.



## **Information and Communications Standard**

ClubLink is committed to meeting the communication needs of persons with disabilities. Upon request, ClubLink will consult with persons with disabilities to determine their information and communication needs. This will be done in a timely manner and at a cost that is no more than the regular cost charged to other persons if applicable.

Upon request, ClubLink will offer a variety of accessible formats (alternatives to standard print) and communication supports (methods to assist communication) as outlined in the Customer Service Standard and further defined under this Standard for compliance by January 1, 2016.

Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats used by persons with disabilities. Communication supports include but are not limited to, captioning, alternative and augmentative supports such as the use of letter, word or picture boards, sign language, and other supports that facilitate effective communications.

As of January 1, 2014, ClubLink will ensure that all new websites and content on those sites conform with [WCAG 2.0, Level A](#).

By January 1, 2021, ClubLink will ensure that all websites and content conform with [WCAG 2.0, Level AA](#).

## **Employment Standard**

ClubLink has processes and procedures in place to ensure accommodation for persons with disabilities in the workplace. By January 1, 2016, ClubLink will review its current processes and procedures and implement changes, where needed, to comply with the Employment Standard.

As per the Standard, current practices and other relevant legislation, including the Human Right Code, ClubLink will:

1. Notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.
2. 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.

3. 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.
4. Notify the successful applicant of the policies for accommodating employees with disabilities.
5. Inform its employees of its policies used to support people with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.
6. Provide the information required under this section to new employees after they begin their employment.
7. Provide updated information to employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

### **Accessible Formats and Communication Supports for Employees**

Where an employee with a disability requests it, ClubLink will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

1. Information that is needed in order to perform the employee's job; and
2. Information that is generally available to employees in the workplace.

For a partial list of potential accessible formats and communication supports, see the 'Information and Communications Standard' above.

### **Documented Individual Accommodation Plans**

Documented individual accommodation plans will be developed for employees with disabilities. ClubLink will ensure that the plan includes:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which ClubLink can request an evaluation by an outside medical or other expert, to determine if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information.

6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done
7. The method by which we provide reasons for any individual accommodation plan being denied.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans will include any information regarding accessible formats and communications supports. It will also include individualized workplace emergency response information, and will identify any other accommodation that is to be provided. For more information on accommodation in the workplace review the ***Duty to Accommodate Policy and Accommodation Request Form***.

### **Return to Work Process**

ClubLink will have in place and documented a return to work process for an employee who:

- a) Has been absent from work due to a disability.
- b) Requires disability-related accommodations in order to return to work.

The documented return to work process will outline the steps to facilitate the return to work, including individual accommodation plans, as described.

### **Performance Management**

When performance management is practiced, ClubLink will use a process that takes into account the accessibility needs for employees with disabilities. Information on the accommodation needs will be included in individual accommodation plans.

### **Career Development and Advancement**

ClubLink will provide career development and advancement to its employees that takes into account the accessibility needs for employees with disabilities. Information on the accommodation needs will be included in individual accommodation plans.

### **Redeployment**

ClubLink will ensure that redeployment takes into account the accessibility needs of its employees with disabilities. Information on the accommodation needs will be included in individual accommodation plans.

## **7. CUSTOMER FEEDBACK PROCEDURE**

### *A. Receiving Feedback*

Feedback from our customers provides ClubLink with opportunities to learn and improve. ClubLink recognizes the right of our customers to make a complaint, a compliment or suggest ways to improve our services.

To ensure that the delivery of goods and services to persons with disabilities is provided in an effective and timely manner, customers are invited to provide their feedback in any preferred format including:

- In person at any ClubLink property.
- By telephone at 905-841-3730
- In writing to: Attention: Human Resources, ClubLink Corporation ULC, 15675 Dufferin Street, King City, Ont., L7B 1K5

### *B. Responding to Feedback*

ClubLink will respond either in writing, in person, e-mail and/or by telephone, based on the format requested. They will acknowledge receipt and outline any actions that will be taken in response to the feedback.

## **8. MATERIALS/DOCUMENTATION**

ClubLink shall supply a copy of the policies, practices and procedures required under the Ontario Regulation 429/07, Customer Service Standard and the Ontario Regulation 191/11, the Integrated Accessibility Standards, to any person in alternate formats as requested.

### **Compliance Reporting and Reviews**

The AODA allows for the enforcement of the regulations through inspections, compliance orders and administrative penalties.

### **How will the government be enforcing the AODA and its standards?**

The accessibility reports that are required to be submitted to the government will be the primary tool for monitoring enforcement of the AODA.

**What is an offence under the AODA?**

Among other things, a person is guilty of an offence who:

- provides false or misleading information in an accessibility report or otherwise provides a director with false or misleading information;
- fails to comply with any order made by a director or the Tribunal under the AODA;
- obstructs an inspector carrying out an inspection under a warrant, or intimidates, coerces; or
- penalizes or discriminates against someone who is seeking to enforce the AODA or a director's order.

**What is the maximum penalty for non-compliance?**

Certain actions or inaction (such as failure to comply with a director's order) constitute an offence under the AODA.

If a person is found guilty of an offence, a fine of up to \$50,000 per day may be levied for each day or part of a day that the offence occurs or continues to occur.

A corporation may be liable for a fine of up to \$100,000 per day for each day or part of a day that the offence occurs or continues to occur.

**For More Information**

To review the Accessibility for Ontarians with Disabilities Act, visit <http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/index.aspx>