



FPH GROUP INC.

Title: Accessibility for Ontarians With Disabilities Policy and Plan (AODA Policy)	Date of Issue: April 2021
Approved by: Manoj Mehta – President Rob Wilson – Plant Manager	Review / Revise Date:
Location: Lunchroom (Common Area) Policy Binder	

### **PURPOSE:**

This plan is intended to provide the overarching framework to guide the review and development of other FPH Group policies, standards, procedures, and guidelines to comply with the standards developed under the Accessibility for Ontarians with Disabilities Act 2005, S.O. 2005, c.11. (AODA).

### **LEGISLATION:**

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11  
Accessibility Standards for Customer Service, O. Reg. 429/07  
Integrated Accessibility Standards, O. Reg. 191/11

### **SCOPE:**

Owner/President	Managers	Contractors
Supervisors	Vice President	Service Technicians
Visitors/Customers	Office Admin	Delivery Personnel
Employees	JHSC	Directors

### **DEFINITION:**

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.

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

Disability - is defined, per Section 2 of the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Human Rights Code, R.S.O. 1990, c. H.19, as follows:

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



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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.”

Kiosk - an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Large Organization - as defined, per Section 2 of the Integrated Accessibility Standards, O. Reg. 191/11, as an obligated organization with 50 or more employees in Ontario, other than the Government of Ontario, the Legislative Assembly or a designated public sector organization.

Service Animals - are defined, per Section 4(9) of the Accessibility Standards for Customer Service, O. Reg. 429/07, as animals where 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.

Support Person - is defined, per Section 4(8) Accessibility Standards for Customer Service, O. Reg. 429/07, as another person who accompanies a person with a disability in order to help with communication, mobility, personal care, medical needs or with access to goods or services.

Unconvertible - information or communications are unconvertible if it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available.

**POLICY:**

FPH Group is committed to excellence in serving all customers including people with disabilities. We treat employees, customers and vendors in a manner that respects their dignity. FPH Groups goods and services are to be available to people with disabilities in a manner that is free from discrimination; can be obtained in accessible formats and communication supports, provides an opportunity equitable to others to obtain, use and benefit from our goods or services, and takes into consideration a person's disability.



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## GENERAL STANDARDS:

FPH Group is classified as a **large organization** under the AODA and is committed to meeting the requirements and timelines for compliance as set forth in the Act and associated Standards for that classification.

### ACCESSIBILITY PLANS

FPH Group shall produce a multi-year Accessibility Plan. The plan will be made available in an accessible format and with communication supports, upon request. Progress on the plan will be provided annually to FPH Group Management. The Accessibility Plan shall be reviewed and, if necessary, updated at least once every five (5) years.

### ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

FPH Group shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs and at no additional cost. **This does not apply to products and product labels, unconvertible information or communications and information that FPH Group does not control directly or indirectly through a contractual relationship.**

If it is determined that information or communications are unconvertible, the company shall provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible and a summary of the unconvertible information or communications.

### PROCUREMENT OF GOODS, SERVICES, FACILITIES AND KIOSKS

When procuring goods, services, self-service kiosks or public facilities, FPH Group shall incorporate accessibility criteria and features, unless it is not feasible (practicable). If not practicable, FPH Group shall provide an explanation, upon request.

### AODA CUSTOMER SERVICE TRAINING

All FPH Group employees, volunteers and third parties providing goods and services to members of the Ontario public, on FPH Group's behalf, as well as those who develop the policies, practices and procedures governing the provision of goods or services to members of the public or other third parties will receive accessibility training as it pertains to the purpose and requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and instruction about the following matters:

This training shall include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard;
- How to interact and communicate with persons with various types of disability;



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- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
- What to do if a person with a particular type of disability is having difficulty accessing our goods or services.

#### **AODA INTEGRATED STANDARDS TRAINING**

All FPH Group employees will receive training on the requirements of AODA Integrated Accessibility Standards (Ontario Regulation 191/11), and on FPH Group's Accessibility Policy.

The training provided shall be appropriate to the duties of the employee, volunteer or third party. Training shall take place within the first week of employment as part of the Health & Safety Orientation. Upon completion, FPH Group shall keep a record of the training provided including the dates on which accessibility training took place.

#### **MODIFICATIONS TO POLICIES**

All policies of FPH Group will be written so as to respect and promote the dignity and independence of people with disabilities.

#### **FEEDBACK**

Feedback on how services were delivered to people with disabilities shall be invited, forwarded to the appropriate personnel, responded to, documented and tracked. Feedback shall be collected by phone at 519-686-9965 ext. 340, or by e-mail to [finance@fphgroup.com](mailto:finance@fphgroup.com). Feedback shall be accepted in accessible formats and with other communication supports as required. Customers can expect to hear back within 5 business days.

#### **DOCUMENTATION**

Documentation that describes this Policy and each of its requirements shall be maintained on the FPH Group shared drive and shall be provided to individuals, upon request, in the appropriate format or communication support.

#### **CUSTOMER SERVICE STANDARDS:**

FPH Group facilities are typically not open to the public. Should any area of the facility be temporarily open to the public at any point, accommodations as listed below will be made for people with disabilities.

#### **ASSISTIVE DEVICES**

FPH Group employees, volunteers and third party contractors shall accommodate the use of personal assistive devices including but not limited to, wheelchairs, canes, walkers, scooters and Braille display boards.



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## SERVICE ANIMALS

FPH Group employees, volunteers and third party contractors shall accommodate the use of service animals by people with disabilities who are accessing areas of our facilities open to the public.

## SUPPORT PERSONS

Where a person with a disability accessing our facility is accompanied by a support person, FPH Group employees, volunteers and third party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

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

### COMMUNICATION

When communicating with a person with a disability, FPH Group employees, volunteers and third party contractors shall do so in a manner that takes into account the person's disability and maintains their dignity and respect.

### TERMINOLOGY

When referring to people with disabilities, FPH Group employees, volunteers and third party contractors shall use terminology that maintains a respectful and inclusive environment.

<b>Do Not Say</b>	<b>Preferred Terminology</b>
Special needs	Person with specific requirements
Disabled, handicapped	Person with disabilities
Caregiver	Personal support worker
Disabled Parking	Accessible Parking

## ACCESSIBLE WEBSITES AND WEB CONTENT

Internet websites and web content controlled directly by FPH Group or through a contractual relationship that allows for modification of the product shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

## EMERGENCY PROCEDURES, PLANS AND INFORMATION

FPH Group does not provide emergency procedures, plans or safety information, to the public.



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## **EMPLOYMENT STANDARDS:**

### **RECRUITMENT**

FPH Group shall post information about the availability of accommodations for applicants with disabilities in its recruitment process (job postings, job fairs, etc.). Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. FPH Group shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants shall be notified about FPH Group's policy for accommodating employees with disabilities as part of their offer of employment.

### **EMPLOYEE SUPPORTS**

FPH Group will inform employees of the 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. FPH Group will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all 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 EMPLOYEE**

Upon an employee's request, FPH Group shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job and for information that is generally available to employees in the workplace.

FPH Group will consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **WORKPLACE EMERGENCY RESPONSE INFORMATION**

If an employee's disability is such that accommodation is required through the workplace Emergency Response Plan, and FPH Group is aware of the need for accommodation, this information shall be provided to the employee, and with the employee's consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed, and when Management reviews the Emergency Response Plan.

### **DOCUMENTED INDIVIDUAL ACCOMODATION PLANS**

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities, if requested. These plans shall include information regarding accessible formats and communications supports. If requested, the plans shall include individualized workplace emergency response information.



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### RETURN TO WORK PROCESS

FPH Group has in place a documented Return to Work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process outlines the steps that FPH Group shall take to facilitate the return to work.

### PERFORMANCE MANAGEMENT AND CAREER DEVELOPMENT AND REDEPLOYMENT

FPH Group shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment

### **TRANSPORTATION STANDARDS:**

FPH Group does not own or operate any public transportation services in the province of Ontario.

### **BUILT ENVIRONMENT STANDARDS:**

FPH Group does not own or maintain any public spaces in the province of Ontario. The FPH Group manufacturing facility and office are built in accordance with the Ontario Building code.

### **ROLES AND RESPONSIBILITIES:**

Management will:

- Be part of the discussion on changes / amendments to legal requirements
- Participate in training
- Review program annually
- Monitor and enforce program compliance
- Understand and follow worker responsibilities as defined in this document

HR Manager will:

- Be the key person to identify new and amendments to existing legal requirements
- Ensure all workers are properly trained as per AODA and associated standards.
- Update applicable policies to account for Accessibility requirements.

Supervisors will:

- Monitor and enforce program compliance.
- Understand and follow worker responsibilities as defined in this document.



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Workers will:

- Participate in training
- Understand and comply with the FPH Group's Accessibility Policy
- Treat employees, customers and vendors in a manner that respects their dignity.

Sub Contractors will:

- Understand and comply with the FPH Group's Accessibility Policy
- Treat employees, customers and vendors in a manner that respects their dignity

Suppliers and Visitors will:

- Understand and comply with the FPH Group's Accessibility Policy
- Treat employees, customers and vendors in a manner that respects their dignity

JHSC will:

- Review the changes / amendments to legislation
- Provide input on the changes
- Assist in determining what type of training is required
- Assist in determining the best method to provide information to employees

**COMMUNICATION:**

- All employees will be communicated the policy in their employee handbook as well as the policy being available in the lunchroom
- New hires will receive communication via orientation and a power point presentation

**TRAINING:**

- Training will be provided to all employees and new hires (during orientation) via Ontario Human Rights Commission training provided regarding the Code and the AODA and receive a certificate available here: [Certificate Version | Ontario Human Rights Commission \(ohrc.on.ca\)](https://www.ohrc.on.ca). Training on the applicable AODA modules will be done online using AccessForward training found here: [AccessForward - General Requirements](#)

**EVALUATION:**

- There are quizzes/ check points during the online presentations