



MAGNA GOLF CLUB

Accessibility for Ontarians with Disabilities Act (AODA) Policy and Plan

June 2023

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1. PURPOSE

The purpose of this policy is to ensure all facilities and services at Magna Golf Club (MGC) are accessible to all members and invited guests in accordance with 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.

2. POLICY STATEMENT

MGC 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 by meeting our accessibility requirements under Ontario's accessibility laws.

3. 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 MGC, whether the person does so as an employee, agent, volunteer or otherwise.

3.1 Management Responsibilities

It is the responsibility of managers and supervisors to ensure that all employees conduct themselves in an appropriate manner and abide by our 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 behaviours and conduct.

3.2 Employee Responsibilities

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

4. 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
- b) 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,
- c) a condition of mental impairment or a developmental disability,
- d) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- e) a mental disorder, or
- f) an injury or disability for which benefits were claimed or received under the insurance plan established under the WSIB.

Integrated Accessibility Standard Regulation (IASR) – A combination of four standards: information and communications, employment, transportation, and design of public spaces 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 MGC and its employees, volunteers, agents, and contractors.

5. 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 should 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 should 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.

6. MULTI-YEAR ACCESSIBILITY PLAN

MGC has developed and will maintain a Multi-Year Accessibility Plan (the "MYAP") that sets out MGC's strategy for preventing and removing accessibility barriers from our workplaces and meet its requirements of the IASR. The MYAP will be reviewed and updated at least once every five years.

The MYAP is posted on MGC's website. Upon request, MGC will provide a copy of the MYAP in an alternative accessible format.

7. ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Ontario Regulation 429/07

7.1 Communication

MGC will communicate with people with disabilities in ways that take into account their disability. Employees who interact with customers will be provided with training on how to communicate inclusively with people with various types of disabilities.

7.2 Assistive Devices

MGC is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. MGC is committed to educating its staff on the proper use of assistive devices available on our premises for member and guest use.

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

7.3 Service Animals

A person with a disability may enter the premises and be accompanied by their service animals in all areas open to the public. If a service animal must be excluded based on law (i.e., access to the kitchen), an explanation will be provided to the person why this is the case and explore alternative ways to meet his/her needs.

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, a member of MGC's management team may ask the person with a disability for a letter from a regulated health professional confirming that the person requires the animal for reasons relating to his/her disability.

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

7.4 Support Persons

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 or medical needs or with access to goods or services.

MGC is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter MGC's premises with his or her support person.

MGC 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. Before making a decision, a member of MGC's management team will:

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- 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. In such a situation, MGC will waive any fee associated with access to the premise.

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

Fees for Support Persons

MGC 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 MGC website under the fees section.

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

Support Persons accompanying a person with a disability who does not utilize any of the services provided by MGC (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.

7.5 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.

7.6 Customer Service Standard Training and Records

MGC will provide appropriate training to all members of the organization including employees, volunteers, and to all other persons to whom this Policy applies, as well as to those persons charged with developing this Policy, and related procedures and practices, as required under the Act.

a) Content of Training

- i) AODA and the Integrated Accessibility Standard Regulation Training will include the following topics:
 - The purpose and principles of the AODA and IASR

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- Barriers to accessibility
- The Ontario Human Rights Code
- Customer service standard
- Interacting and communicating with people with disabilities
- Assistive devices
- Information and communications standard
- Employment standard
- Transportation standard
- Design of public spaces standard

ii) Assignment of online training

- All employees and volunteers of MGC will receive the AODA and the Integrated Accessibility Standard Regulation Training online training program through VOCAM titled MGC AODA.

b) Timing of Training

- Training will be provided to all employees and volunteers as soon as practicable after he/she is assigned the applicable duties. Training is assigned electronically when work is started with scheduled reminders provided. Training is expected to be completed as soon as possible with a formal follow-up after two weeks if not completed.

c) Documenting Training

- Records of completed training including the names, dates shall be maintained in accordance the requirements of the Act.

8. INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) Ontario Regulation 191/11

8.1 General

Accessibility Plan

A multi-year accessibility plan is available on our public website, www.magnagolf.com. It outlines the actions that MGC has put in place and will put in place to eliminate barriers for persons with disabilities to meet the requirements of the regulation.

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Accessible Emergency Information

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

Please see the Individualized Workplace Emergency Response Information (IWERI) form to create a plan.

IASR Training and Records

MGC will provide training to all members of the organization including employees, volunteers, and to all persons to whom this Policy applies as well as to those persons charged with developing this Policy and related procedures and practices, as required under the Act.

For more information on training initiatives, please refer to the training section as addressed above in section 6. Accessibility Standards for Customer Service.

8.2 Information and Communications Standard

MGC is committed to meeting the communication needs of persons with disabilities. Upon request, MGC 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, MGC 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.

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.

Websites and Web Content

MGC will work with contracted web developers to ensure that all MGC websites and content conform with WCAG 2.0, Level AA.

8.3 Design of Public Spaces

The design of public spaces standard does not currently apply to MGC. If it does become applicable, this policy will be updated accordingly.

8.4 Employment Standard

MGC has processes in place to ensure accommodation for persons with disabilities in the workplace.

As per the Standard, current practices, and other relevant legislation, including the Human Rights Code, MGC is committed to:

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.

8.5 Accessible Formats and Communication Supports for Employees

Where an employee with a disability requests it, MGC 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.

8.6 Documented Individual Accommodation Plans

Documented individual accommodation plans will be developed for employees with disabilities. MGC 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 MGC 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 steps taken to protect the privacy of the employee's personal information.
5. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done
6. The method by which we provide reasons for any individual accommodation plan being denied.
7. 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, Accommodation Request Form and MGC Physical & Cognitive Abilities Form***

For emergency response plans, please see the Individualized Workplace Emergency Response Information (IWERI) Form to create a plan.

8.7 Return to Work Process

MGC has a documented return to work process that outlines the steps to facilitate the return to work, including individual accommodation plans, 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.

8.8 Performance Management

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

8.9 Career Development and Advancement

MGC 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.

8.10 Redeployment

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

9. CUSTOMER FEEDBACK PROCEDURE

a) *Receiving Feedback*

Feedback from our customers provides MGC with opportunities to learn and improve. We recognize 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, but not limited to:

- In person at Magna Golf Club
- By telephone (Contact Lindsey Stanford, Human Resources at (905) 726-7658)
- In writing to: Attention – Lindsey Stanford, Magna Golf Club, 14780 Leslie Street, Aurora, Ontario L4G 7C3 or lindsey.stanford@magnagolf.com

Upon request, MGC will provide or arrange for accessible formats and communication supports.

b) Responding to Feedback

Complaints will be addressed as quickly as possible. Customers and third parties can expect acknowledgement of feedback within five business days. The acknowledgement will indicate when the matter will be addressed and when the customer/third party will be notified. Magna Golf Club will follow up with any required action within the timeframe noted in the acknowledgement. Every effort will be made to provide the response in a format that is accessible to the person who provided the comments.

10. SELF-SERVICE KIOSKS

A self-service kiosk is an interactive electronic terminal used to access many kinds of products and services. MGC will consider accessibility when designing, purchasing or acquiring self-service kiosks.

11. MATERIALS/DOCUMENTATION

MGC 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.

11.1 Retention

- All training records will be retained for 10 years.
- All SOP and PowerPoint training revisions will be retained for 10 years.
- All feedback and complaints will be retained for 10 years.

11.2 Compliance Reporting and Reviews

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

MGC will file an Accessibility Compliance Report as required by the Act. The compliance report confirms that organizations have met the current accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

11.3 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.

11.4 What is an offence under the AODA?

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

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- 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.

11.5 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.

11.6 Communication of policy changes

All changes to the MGC AODA policy and plan will be communicated to employees on an ongoing basis. This will include any necessary training based on the changes made.

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>

12. ACKNOWLEDGEMENT AND APPROVAL

General Manager

Stuart Brindle		June 24, 2023
Name	Signature	Date

Human Resources

Lindsey Stanford		June 21/23
Name	Signature	Date