

**Accessibility for Ontarians with Disability (AODA)  
For InnVest Hotels LP**

**Accessible Customer Service**

**InnVest Hotels LP.**, is committed to excellence in serving all customers including people with disabilities.

**Definitions**

For the purpose of this policy:

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

**Accessibility** means giving people of all abilities opportunities 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, product, or environment.

**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.

**Assistive devices** mean an auxiliary aid such as communication aids, cognition aids, personal mobility aids, mobility assistive devices and medical aids (canes, wheelchairs, crutches, or hearing aids).

**Barrier** means anything that keeps someone 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;
- **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.

**Customers** means the subset of the general public to whom **InnVest Hotels LP** provides goods, services, and facilities, in the ordinary course of business, including, but not limited to, hotel guests, contractors, employers, and other representatives of the public.

**Communication supports** may include, but are not limited to, captioning, alternative and augmentative communication supports (i.e. methods used to supplement or replace speech or writing for those with impairments in the production or comprehension of spoken or written language), plain language, sign language, and other supports that facilitate effective communication.

**Guide Dog** means a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

**Information** means data, facts, and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**Person Requiring Assistance (PRA)** means a person identified as requiring assistance at the time of an evacuation. This can be due to a medical condition or some other reason.

**Person with Disabilities** means an individual who has a disability. "Disability" is defined in the *Ontario Human Rights Code* as:

- 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 in 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; and
- 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*.

**Service Animal** means a service animal for a person with a disability if:

- a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:

A member of:

- the College of Audiologists and Speech-Language Pathologists of Ontario;
- the College of Chiropractors of Ontario;

- the College of Nurses of Ontario;
- the College of Occupational Therapists of Ontario;
- the College of Optometrists of Ontario;
- the College of Physicians and Surgeons of Ontario;
- the College of Physiotherapists of Ontario;
- the College of Psychologists of Ontario; or
- the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

**Support Persons** means any person whether a paid professional, volunteer, family member, or friend who accompanies a person with a disability in order to help with communication, mobility, personal care, or medical needs or with access to goods, services, or facilities.

**Temporary Disruption** means a short term planned or unplanned disruption to facilities or services that persons with disabilities usually use to obtain **InnVest Hotels LP's** goods and/or services.

**Undue Hardship:** The duty to accommodate obliges the employer to make reasonable efforts to alter the workplace to accommodate an employee's disability related needs thus allowing the employee to properly carry out their work duties. This duty stops short of the employer experiencing "undue hardship." Such undue hardship generally involves excessive interference with a business' operation, or an increased risk to the health and safety of the employee, co-workers, or others. What constitutes undue hardship varies based on the circumstances surrounding each individual case.

**Web Content Accessibility Guidelines (WCAG)** means the World Wide Web Consortium Recommendation, dated December 2008, entitled *Web Content Accessibility Guidelines 2.0*.

### **Assistive devices**

We will ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods or services.

### **Communication**

We will communicate with people with disabilities in ways that take into account their disability.

### **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.

## **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.

- Fees will not be charged for support persons

## **Notice of temporary disruption**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, **InnVest Hotels LP**, 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.

The notice will be placed at conspicuous public areas around the premises.

## **Training**

**InnVest Hotels LP** will provide training to all employees, volunteers and others who deal with the public or other third parties on our behalf. Training will also be provided to people involved in the development of policies, plans, practices, and procedures related to the provision of our goods and services.

This training will be provided to new staff during orientation.

Training will include:

- An overview of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard
- **InnVest Hotels LP's**, plan related to the customer service standard.
- 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 TTY, wheelchair lifts, etc., available on-site or otherwise that may help with providing goods or services to people with disabilities
- What to do if a person with a disability is having difficulty in accessing **InnVest Hotels LP's**, goods and services

Staff will also be trained when changes are made to the accessible customer service plan.

## **Feedback process**

Customers who wish to provide feedback on the way **InnVest Hotels LP**, provides goods and services to people with disabilities can be provided by e-mail, verbally, or feedback card.

All feedback, including complaints, will be directed to the General Manager.

Customers can expect to hear back in 24 to 48 hours.

## **Employment**

**InnVest Hotels LP** is committed to providing fair and accessible employment practices.

In our commitment to provide a selection process and work environment that is inclusive and barrier free, accommodation will be provided in accordance with the *Ontario Human Rights Code*. Any special accommodation needs required in order to allow you to participate in the hiring process to your full potential can be arranged in advance by contacting The Hiring Manager, who will work to arrange reasonable and appropriate accommodation.

## **Recruitment**

**InnVest Hotels LP** has reviewed our recruitment and assessment practices to ensure compliance with the Employment accessibility standard by January 1, 2016. This includes the requirement to notify the public and staff that, when requested, **InnVest Hotels LP** will accommodate people with disabilities during the recruitment and assessment processes. Successful applicants will be notified about **InnVest Hotels LP's** accommodation policies at the time the offer of employment is made. This information will also be shared with new staff during onboarding training.

## **Individual Accommodation Plans and Return to Work Processes**

**InnVest Hotels LP's** current Accommodation Process provides employees with individualized accommodation and does comply with the steps outlined in Section 28 of the Accessibility Standards. Our current Accommodation Process includes return to work practices for employees that have been absent due to disability or illness.

To ensure that our Accommodation Process is in full compliance with this requirement, we have developed, a written procedure that will clarify what roles HR, Managers, and employees will have in the process. This will include:

- Defining the manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The manner in which the employee can request the participation of a representative from their bargaining unit (if applicable), where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining unit, in the development of the accommodation plan.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

## **Performance Management and Career Development Processes**

**InnVest Hotels LP** currently has performance management and career development tools in place for employees. We will review these tools and processes to ensure that the accessibility needs of employees with disabilities are taken into account.

## **Redeployment Processes**

**InnVest Hotels LP** does not currently have a redeployment process in place. For large-scale organizational changes we follow **InnVest Hotels LP's** principles which are global guidelines to manage people impacts of largescale organizational changes consistently and fairly.

If **InnVest Hotels LP** should put a redeployment process in place, we will ensure that accessibility needs of employees are taken into account including the individual accommodation plans.

## **Design of Public Spaces**

**InnVest Hotels LP** will meet the Accessibility Standards for the Design of Public Spaces in Ontario when building or making major modifications to public spaces. Public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals
- Accessible off-street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

## **Notice of Availability**

**InnVest Hotels LP** will notify the public that our policies are available upon request by posting a notice at the Front Desk.

## **Modifications to this or other policies**

Any policy of **InnVest Hotels LP**, that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.