



Title: Integrated Accessibility Policy (“IAS Policy”)	Date of Issue: December 12, 2023
Approved by: Adam Carapella	Review / Revise Date: December 12, 2028
made pursuant to the provisions of the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 (hereinafter the AODA”). This IAS Policy is © Tricar, 2023. Please note that this IAS Policy is for the use of Tricar.	

## Part I: General

### 1. Objective

Tricar believes that ensuring our offices and our services are accessible is an integral part of our commitment to providing our residents with exemplary service. To that end, we have established this IAS Policy which governs how Tricar has achieved or how we will achieve accessibility by meeting our requirements pursuant to O. Reg. 191/11: Integrated Accessibility Standards (the “Integrated Accessibility Standard” or “IAS”) under the *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, c. 11 (“AODA”). This IAS Policy and all of the related procedures and forms are guided by the fundamental principles underlying the AODA: dignity, independence, integration and equal opportunity. Tricar is committed to developing, implementing, and maintaining policies aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

### 2. Application

This IAS Policy applies to all of our employees, volunteers and any third party who provides goods, services or facilities on Tricar’s behalf.

### 3. Multi-Year Accessibility Plans

Tricar shall establish, implement, maintain and document a multi-year plan that outlines our strategy to prevent and remove barriers and meet our requirements under the Integrated Accessibility Standard. This Multi-Year Plan shall be available on our website and shall be provided in an accessible format upon request. Tricar shall review and update the Multi-Year Plan at least once every five (5) years. The Multi-Year Accessibility shall include the following:

1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required Part IV.1 the Integrated Accessibility Standard; and
2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.

#### **4. Training**

All employees, volunteers, and third parties who provide goods, services or facilities on Tricar's behalf shall receive training on the requirements of the Integrated Accessibility Standard, the IAS Policy and the *Human Rights Code* as it pertains to persons with disabilities. This training shall include, but is not limited to, a review of the purposes of the AODA and the requirements of this Part IV.2 Customer Care Standards, and instruction about the following matters:

- a) How to interact and communicate with persons with various types of disability.
- b) 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.
- c) How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.
- d) What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

This training shall be provided as soon as practicable and shall be appropriate to the duties of the employees, volunteers, and those who provide goods, services or facilities on Tricar's behalf. Additional training shall be provided on an ongoing basis whenever changes are made to this IAS Policy to ensure that this IAS Policy is properly implemented at all times. Tricar will keep records of the training provided, including the dates on which training was received and the names and number of participants.

## **Part II: Information and Communication**

#### **5. Feedback Process**

Tricar has a designated AODA Compliance Team that receives and responds to feedback, including but not limited to: feedback about this IAS Policy; the manner in which this IAS Policy

is implemented; the manner in which Tricar provides goods, services and facilities to persons with disabilities; and, the feedback process outlined in this IAS Policy.

Feedback may be provided by using an AODA Feedback Form or by contacting the AODA Compliance Team by mail, phone, or e-mail. Feedback may be provided by a person with a disability in the manner they deem most convenient to them.

The AODA Compliance Team will make best efforts to respond to all feedback within three (3) business days. The author of the feedback will be provided a response in the format requested (or the most appropriate format where no request was made) outlining the actions taken or the action that will be taken in the future.

Feedback will be kept for a minimum of one (1) year from the date it was provided. After that time, feedback may be kept or destroyed at the sole discretion of the AODA Compliance Team.

## **6. Accessible Formats and Communication Supports**

Tricar shall post notice of the availability of accessible formats and communication supports in a conspicuous place at its offices, on its website, and at the properties that it manages. Upon receiving a request, Tricar shall consult with the person making the request in determining the suitability of an accessible format or communication support. Tricar shall provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. Unless otherwise indicated, accessible formats and communication supports shall be provided at a cost that is no more than the regular cost charged to other persons.

## **7. Emergency Procedure or Public Safety Information**

Tricar will provide any emergency plans, procedures, or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports upon request and as soon as practicable.

c

## **8. New Websites and Web Content**

Tricar shall ensure that any new internet websites and web content on those new websites conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A.

### **8.01 Effective Date to Meet Level AA**

Tricar shall ensure that all required websites and web content conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, other than criteria 1.2.4 (live captions) and criteria 1.2.5 (pre-recorded audio descriptions).

## **9. Exemptions**

Part II of this IAS Policy does not apply to: products and product labels (except as specifically provided); unconvertible information or communications; or information that Tricar does not control directly or indirectly through a contractual relationship.

## **Part III: Employment**

### **10. Recruitment, Assessment or Selection Process**

Tricar's recruitment process is designed to be inclusive and Tricar accepts applications from all qualified individuals. As part of the recruitment process, Tricar shall:

- (a) notify all selected applicants that accommodations are available upon request in relation to the materials or processes to be used;
- (b) upon receiving a request for accommodation from a selected applicant, Tricar shall consult with the selected applicant and shall provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs;
- (c) notify the successful applicant about its policies for accommodating employees with disabilities;
- (d) as soon as practicable after they begin their employment, Tricar shall advise new employees of its policies used to support its employees with disabilities; and
- (e) provide updated information to its employees when there is a change to its accommodations policies.

Tricar shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. Accommodation during the recruitment process may include, but is not limited to, providing and receiving information and documents in accessible formats, the use of assistive devices, and/or service animals.

The employment standards in this section only apply in respect of employees. The employment standards in this section do not apply in respect of volunteers and other non-paid individuals.

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

In addition to any other obligation under this IAS Policy, upon request, Tricar shall provide or arrange for the provision of accessible formats and communication supports for:

- (a) Information that is needed to perform the employee's job; and
- (b) Information that is generally available to employees in the workplace.

Tricar shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **12. Workplace Emergency Response Information**

If an employee has a disability (whether permanent or temporary) and the employee thinks that they may need individualized workplace emergency response information, Tricar asks that the employee inform either the Human Resources ("HR") Department or the AODA Compliance Team.

As soon as practicable after being notified of the need for individualized workplace emergency response information, Tricar shall provide workplace emergency response information that is tailored to the employee's individual needs. This individualized information shall be reviewed with the employee at the following times: when the employee moves to a different location in the organization; when the employee's overall accommodation needs or plans are reviewed; and, when Tricar reviews its general emergency response policies.

If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent Tricar shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

### **13. Documented Individual Accommodation Plans**

Tricar provides accommodation to employees that encounter barriers to employment because of a disability up to the point of undue hardship. These barriers may include anything that prevents a person with a disability from fully participating in all aspects of their employment because of their disability including: a physical barrier; an architectural barrier; an information or

communications barrier; an attitudinal barrier; a technological barrier; and/or a policy or practice. The accommodations provided to an employee with a disability shall be recorded in an Individual Accommodation Plan.

Individual Accommodation Plans shall,

- (a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 11 above;
- (b) if required, include individualized workplace emergency response information, as described in section 12 above; and
- (c) identify any other accommodation that is to be provided.

### **13.01 Individual Assessment Form**

Tricar recognizes that an employee may have a need for accommodation during their employment. When an employee believes that he or she may need accommodation (whether permanent or temporary), the employee is required to complete an Individual Assessment Form as soon as practicable. Where the employee is perceived to be unwell or to be in need of disability-related accommodation, Tricar may also initiate a dialogue with the employee to determine if accommodation in the workplace may be necessary.

The Individual Assessment Form asks the employee to think about various job-related tasks/activities and situations that may arise during their employment. It is intended to help identify barriers that could arise in the workplace or during an emergency situation. The employee has an opportunity to provide suggestions on how to overcome these potential barriers. The employee's input is intended to help Tricar provide the employee with appropriate accommodations.

### **13.02 Review Individual Assessment Form**

When the Individual Assessment Form is complete, the employee should provide the Individual Assessment Form to the HR Department. Where accommodation may be required, the employee will be asked to work with the HR Department and the AODA Compliance Team to develop an Accommodation Plan.

### **13.03 Participation of Third Parties at Tricar's Request**

Tricar does not require details on the nature of the employee's disability to create an Accommodation Plan; however, Tricar does need to know about the employee's functional abilities and limitations and Tricar may request medical documentation from the employee's family doctor and/or health care provider. In order to properly complete the Individual Assessment Form and/or the Accommodation Plan, Tricar may also request an evaluation by an outside medical or other expert, at Tricar's expense, to determine if and how accommodation can be achieved.

### **13.04 Participation of Third Parties at Employee's Request**

The employee may wish to have a representative from Tricar involved in the completion of the Individual Assessment Form and/or the Accommodation Plan (i.e. direct supervisor). If the employee wishes to involve a representative from Tricar, the employee should provide the request to the HR Department and/or the AODA Compliance Team in writing or in an alternative format that takes into account the employee's disability.

### **13.05 Protection of the Employee's Privacy**

Tricar believes that individuals must be accommodated in ways that respect their dignity, worth, and right to privacy in the workplace. As such, all information contained in the Individual Assessment Form and/or the Accommodation Plan and any other information relating to specific requests for accommodation will be treated as confidential and will not be shared without the employee's knowledge and consent.

### **13.06 Approval, Amendment or Denial of Accommodation Plan**

Once complete, the proposed Accommodation Plan shall be provided to Tricar's Management. Tricar's Management shall decide whether to approve, amend or deny the Accommodation Plan. Tricar shall provide the Employee with notice of the decision by Tricar's Management and, if the proposed Accommodation Plan is amended or denied, Tricar shall provide the employee with reasons for the decision. The employee shall be provided with a copy of the approved Accommodation Plan and/or notice of any decision in a format that takes into account their accessibility needs due to their disability.

The employee shall be given ten (10) business days to provide a response to Tricar's decision in writing or in an alternative format that takes into account the employee's disability. Tricar shall

consider the employee's response and shall provide the employee with notice of Tricar's final decision in writing or in an alternative format that takes into account the employee's disability.

### **13.07 Review of Accommodation Plans**

The Accommodation Plan shall be reviewed with the employee at least annually. In addition, the HR Department shall review the Accommodation Plan with the employee in the following circumstances:

- (a) if the employee's work location or position changes;
- (b) if the nature of the employee's disability changes;
- (c) if Tricar makes changes to this IAS Policy; or
- (d) when Tricar reviews its general emergency response policies.

If the accommodation(s) set out in the Accommodation Plan is/are no longer appropriate, the employee shall notify the HR Department as soon as practicable and complete a new Individual Assessment Form and, if needed, amend the Accommodation Plan.

## **14. Return to Work Process**

Tricar shall work with the employee to facilitate a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work.

Tricar has a written process for any employee who may be returning to work following a disability related leave of absence. The process includes the steps taken to facilitate the employees return to work. Where necessary, Tricar shall ask the employee to complete an Individual Assessment Form by a medical professional where the returning employee requires disability-related accommodation in order to return to work.

## **15. Performance Management, Career Development and Redeployment**

Tricar encourages a workplace in which all employees can reach their full potential. Accommodation and accessibility are ongoing commitments to ensure that new and existing employees are able to provide the best possible service to our residents. As part of this commitment, Tricar shall take into account the accessibility needs of employees with disabilities and individual accommodation plans when:

- (a) using its performance management process in respect of employees with disabilities;
- (b) providing career development and advancement to its employees with disabilities; and/or



- (c) reassigning an employee with a disability to another department or job within the organization as an alternative to layoff (if a particular job or department has been eliminated).

## **Part IV.1: Design of Public Spaces**

### **16. Design of Public Spaces**

Where Tricar engages in construction or reconstruction of regulated public spaces, such construction or reconstruction shall comply with the requirements of the Integrated Accessibility Standard as follows:

- a) **Recreational trails:** Tricar shall ensure that all new or redeveloped recreational trails, that Tricar intends to maintain, construct or redevelop on or after January 1, 2017, shall comply with section 80.6 to 80.15 of the IAS Regulation.
- b) **Beach access routes:** Tricar shall ensure that all new or redeveloped beach access routes, including permanent and temporary routes and temporary routes that are established through the use of manufactured goods, which can be removed for the winter months, that Tricar intends to maintain, construct or redevelop on or after January 1, 2017, shall comply with section 80.7 to 80.15 of the IAS Regulation.
- c) **Outdoor public use eating areas:** Tricar shall ensure that all new or redeveloped outdoor public use eating areas, that Tricar intends to maintain, construct or redevelop on or after January 1, 2017 comply with sections 80.16 and 80.17 of the IAS Regulation. Outdoor public use eating areas consist of tables that are found in public areas, such as in public parks, on hospital grounds and on university campuses and are specifically intended for use by the public as a place to consume food.
- d) **Outdoor play spaces:** Tricar shall ensure that all new or redeveloped outdoor play spaces that Tricar intends to maintain, construct or redevelop on or after January 1, 2017, comply with sections 80.18 to 80.20 of the IAS Regulation. Outdoor play spaces consist of an area that includes play equipment, such as swings, or features such as

logs, rocks, sand or water, where the equipment or features are designed and placed to provide play opportunities and experiences for children and caregivers.

- e) **Exterior paths of travel:** Tricar shall ensure that all new or redeveloped exterior paths of travel that Tricar intends to maintain, construct or redevelop on or after January 1, 2017, comply with sections 80.21 to 80.31 of the IAS Regulation. Exterior paths of travel are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience. These requirements do not apply to paths of travel regulated under Ontario Regulation 350/06 (Building Code) made under the *Building Code Act*, 1992.
- f) **Accessible parking:** Tricar shall ensure that all new or redeveloped parking facilities that Tricar intends to maintain, construct or redevelop on or after January 1, 2017, comply with sections 80.32 to 80.39 of the IAS Regulation.
- g) **Service counters:** Tricar shall ensure that all new and replacement service counters, constructed or replaced on or after January 1, 2017, comply with section 80.41 of the IAS Regulation.
- h) **Fixed queuing guides:** Tricar shall ensure that all new fixed queuing lines, constructed on or after January 1, 2017, shall comply with section 80.42 of the IAS Regulation.
- i) **Waiting areas:** When constructing a new waiting area or redeveloping an existing waiting area on or after January 1, 2017, where the seating is fixed to the floor, Tricar shall ensure that a minimum of three per cent of the new seating is accessible, but in no case shall there be fewer than one accessible seat. Accessible seating is a space in the seating area where an individual using a mobility aid can wait.

## **17. Maintain and Limit Disruption of Public Spaces**

Tricar will endeavour to prevent or minimize service disruptions to the accessible parts of its public spaces. In the event of a service disruption, Tricar will notify the public of the service disruption and alternatives available. Tricar shall specifically consider and include procedures for preventative and emergency maintenance of the accessible elements in public spaces to

minimize the disruption in access to the accessible parts of its public spaces in its Multi-Year Accessibility Plan.

## **Part V: Customer Service**

### **18. Providing Goods and Services to People with Disabilities**

Tricar is committed to providing accessible customer service to persons who have disabilities. Tricar will make reasonable efforts to ensure that this IAS Policy and related practices and procedures are consistent with the following principles:

- (a) We will provide goods or services in a manner that respects the dignity and independence of persons with disabilities.
- (b) We will provide integrated services to persons with disabilities wherever possible and will provide alternate measures where necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from our goods or services.
- (c) We will provide equal opportunity to persons with disabilities to obtain, use and benefit from our goods or services.
- (d) When communicating with a person with a disability, we will do so in a manner that considers the person's disability.

### **19. Assistive Devices**

Persons with disabilities shall be permitted to obtain, use or benefit from goods or services through the use of their own assistive devices. In the event that a person with a disability is hindered from accessing any goods or services offered or from using their own assistive device, Tricar will use its best efforts to accommodate the person by offering the use of another assistive device that is available or attempt to deliver the same service in another way.

### **20. Use of Service Animals and Support Persons**

Tricar is committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public. If a service animal is excluded by law, Tricar will suggest appropriate alternatives and provide assistance where possible in

order to ensure that the person is able to access, obtain, use or benefit from Tricar's services and facilities.

Any person with a disability who is accompanied by a Support Person will be allowed to access any of Tricar's services or facilities with their Support Person. Tricar will not prevent a person with a disability who is accompanied by a Support Person from having access to their Support Person. Where there are barriers to access or attendance by a Support Person, Tricar will seek to facilitate access to ensure the participation of persons with disabilities.

## **21. Notice of Temporary Disruptions**

Temporary disruptions in services and facilities may occur from time to time. Tricar will provide notice when there is a temporary disruption in those services or facilities on which persons with disabilities may rely. This notice will include information about the reason for the disruption, its anticipated duration, and, if applicable, a description of alternative facilities or services that may be available. Notice of service disruptions will be provided as soon as reasonably practicable after Tricar is made aware of the disruption, or in advance in the case of planned disruptions.

Notice will be provided by a variety of methods, depending on the circumstances, and may include postings in conspicuous places at its buildings, in other facilities of the building (i.e. the lobby or elevators), on Tricar's website or by any other means that will reasonably ensure that the notice reaches those persons potentially affected by the temporary disruption in a manner that is accessible to them.

## **22. Providing Services to Persons with Disabilities**

Tricar shall ensure that no person with a disability is denied service or receives inferior service on the basis of being a person with a disability.

# **Part VI: Compliance**

## **23. Implementation of IAS Policy**

Tricar's AODA Compliance Team will oversee the implementation of this IAS Policy.

## **24. Accessibility Reports**

The AODA Compliance Team shall ensure that Tricar completes and files all mandatory Accessibility Reports as required by the AODA and the Integrated Accessibility Standard.

## **25. Additional Obligations**

Tricar recognizes that the AODA does not replace or supersede the *Human Rights Code*, R.S.O. 1990, c. H.19, or other laws relating to the accommodation of persons with disabilities.

## **26. Enquiries**

Any comments, questions or concerns related to this IAS Policy and any feedback should be directed to Tricar's AODA Compliance Team:

Name: AODA Compliance Team

Phone Number: 519-652-8900

Email: [aoda@tricar.com](mailto:aoda@tricar.com)

Fax Number: 519-652-8905

Address: 3800 Colonel Talbot Road, London, ON N6P 1H5