

Metcalfe Golf Club

Accessibility Policies

December 2023



Accessibility Policy

POLICY STATEMENT

Metcalfe Golf Club is committed to upholding and exceeding Ontario's legislation intended to remove barriers to accessibility for persons with disabilities. This includes providing equal access to employment, information, goods, and services, and treating persons with disabilities with dignity and respect in a way that takes their disability into account.

DEFINITIONS

Definitions taken from the Accessibility for Ontarians with Disabilities Act, S.O. 2005, C. 11 or Ontario Human Rights Code.

"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.

"Barrier" means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice; ("obstacle").

"Disability" is defined broadly by the Ontario Human Rights Code as:

- "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 coordination, 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,
- 2. a condition of mental impairment or a developmental disability,
- 3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- 4. a mental disorder, or
- 5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*, 1997."

POLICY

Metcalfe Golf Club will make every reasonable effort to meet the requirements of the Accessibility for Ontarians with Disabilities Act (AODA), 2005, including all applicable elements of the Integrated Accessibility Standards.

- 1. Information and Communication
- 2. Employment



- 3. Customer Service
- 4. Design of Public Spaces
- 5. Transportation

Metcalfe Golf Club will provide training to all employees, volunteers, and independent contractors to ensure they are familiar with our policies, practices, and procedures for communicating with and providing services to persons with disabilities.

Information and Communication

Metcalfe Golf Club will make its information accessible to people with disabilities by creating materials and supports in accessible formats, and it will notify the public of the types of accessible formats provided.

Further, Metcalfe Golf Club will deliver alternate formats of information to clients, upon request. If a particular material cannot be converted into an accessible format that meets the needs of the person requesting it, Metcalfe Golf Club will provide details of why it cannot be converted and provide a summary of the information or communication in another way that is suitable to the person requesting it.

This extends to any emergency procedures or safety information prepared by Metcalfe Golf Club.

Employment

Metcalfe Golf Club welcomes and encourages employment applications from people with disabilities and will do its part to make hiring and employee support practices more accessible by providing accommodation during all stages of recruitment, hiring, and employment.

If a job applicant requests accommodation, Metcalfe Golf Club will consult with the applicant and provide suitable accommodation that takes the person's accessibility needs into account.

When making offers of employment, Metcalfe Golf Club will notify the successful applicant of its policies for accommodating employees with disabilities.

New employees will be reminded about the organization's job accommodation policies as soon as possible upon being hired and notified when any future changes are made to policies. Policy and practice information will include available employment accommodations that will be provided for job related matters such as performance management, career development, emergency response plans, and return to work information.

Metcalfe Golf Club will consult with an employee who requests it, to provide or arrange for the provision of accessible formats and communication supports that take the employee's needs into account when providing information that is needed to perform the employee's job, and information that is generally available to employees in the workplace.



Customer Service

Metcalfe Golf Club will provide customer service in a manner that removes barriers for people with disabilities according to the following key principles of the AODA:

- Goods and services will be provided in a manner that respects the <u>dignity</u> and <u>independence</u> of persons with disabilities.
- Service to people with disabilities will be <u>integrated</u> with others, unless an alternate way of providing the goods, service or facility is required by the person with the disability.
- Persons with disabilities will be given <u>equal opportunity</u> to use and benefit from the goods, services, or facilities an organization or business has to offer.
- We will communicate with people with disabilities in a way that takes the individual's disability into account.

Assistive Devices, and Service Animals, Service Dogs or Guide Dogs

Persons with disabilities who use an assistive device will be permitted to use their own device to access the goods and services of Metcalfe Golf Club.

If a person with a disability is accompanied by a guide dog or other service animal, Metcalfe Golf Club shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with them, unless the animal is otherwise excluded by law from the premises.

Support Workers

If a person with a disability is accompanied by a support person, Metcalfe Golf a Club will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

Metcalfe Golf Club will ensure that notice is given in advance if admission fees will be charged to support workers for accessing the goods or services in their role as support person, including how much the fee will be.

Service Interruptions

If there is a temporary disruption in any of our services either in whole or in part, Metcalfe Golf Club will provide notice of the disruption to the public via as many channels as possible, in accessible formats, where available. We will physically post notices where the disruption is taking place as well as through any other channels that are appropriate such as email, phone, text, social media, or on our website.

Notice of the disruption will include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.



Metcalfe Golf Club will accept feedback about the way in which it provides goods and services to persons with disabilities in person, by phone or email, or in another way that is suitable to a person with a disability.

When a complaint is received about the way we provide goods, services, or facilities to persons with disabilities, Metcalfe Golf Club will let the person who submitted the feedback know about the actions the organization will take to resolve the issue.

At Metcalfe Golf Club, the person designated to accept feedback is:

Rob Howell, General Manager, 1956 8th Line Road, Metcalfe Ontario KOA 2PO, 6138213673 ext 2 (or cell 6134060452), rhowell@metcalfegolf.com

Transportation

Metcalfe Golf Club does not provide conventional or specialized commercial transportation services to passengers and is not required to adhere to the Transportation Standard.

Design of Public Spaces

If Metcalfe Golf Club redesigns or redevelops an outdoor public space such as a parking area, outdoor eating area or play space, exterior path of travel, recreational trail or beach access route, or an indoor or outdoor service counter, waiting area or queuing line, it will do so in accordance the Design of Public Spaces Standard of the AODA. Metcalfe Golf Club will also ensure any newly redesigned or redeveloped areas are maintained in accordance with the rules set out by the AODA.

Accessible Customer Service Policy

POLICY STATEMENT

This policy is designed to meet the standards and act in accordance with Regulation 191/11, Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005. These standards were developed to identify, remove and prevent barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. The mandate of the Standard is that all obligated organizations must take measures to provide accessible service to all customers, including customers with all types of disabilities.

PURPOSE

Metcalfe Golf Club is committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities. Metcalfe Golf Club is also committed to ensuring our employees are educated and adhere to this policy. Metcalfe Golf Club will make all reasonable efforts to



ensure that all people are treated and provided customer service in a manner that is consistent with the principles of the AODA: Dignity, Independence, Equal Opportunity and Integration.

POLICY

Customer Service and Communication

Metcalfe Golf Club will ensure that effective customer service and communication is provided to all persons with a disability by adhering to the following:

- Make all reasonable efforts to ensure that the provision of goods and services to persons with disabilities will be integrated into regular practice.
- Offer and provide alternative measures and/or formats if necessary when requested by an individual with a disability.
- Ensure that, to the extent possible, accessible goods and services are delivered in a timely manner.
- All communication shall be provided in a manner that respects the dignity and independence of persons with disabilities.

Assistive Devices

Persons with disabilities may require the use of their own assistive devices to access services or goods. An assistive device is any device that is used, designed, made or adapted to assist people in performing a particular task. Metcalfe Golf Club will take all reasonable measures to ensure goods and services are accessible to persons using assistive devices, including training employees in how best to support a customer using an assistive device.

In the case the use of an assistive device poses a further challenge to the accessibility of goods and services or raises a potential safety concern, all reasonable efforts will be made to accommodate the individual, which may include using an alternative assistive device or providing the same service in a different manner.

Service Animals

Metcalfe Golf Club is committed to welcoming persons with disabilities who are accompanied by a service animal. We will ensure that all staff who deal with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

The following terms apply to a person with a disability who is accompanied by a service animal:

- In the event a particular service animal is not allowed by law on or in a particular area of the premises, all reasonable efforts will be made to accommodate the individual, which may include an alternative form of assistance or providing the same service in a different manner.
- In the event of a valid health and safety issue, all reasonable efforts will be made to accommodate the individual, which may include an alternative form of assistance or providing the same service in a different manner.



- In the case of service dogs, the law allows them to accompany their owner to go where food is served, sold or offered for sale. The law also states service dogs are not allowed in places where food is manufactured, prepared, processed or handled.
- The owner is responsible for maintaining control of the animal at all times.

Support Persons

Metcalfe Golf Club is committed to welcoming persons with disabilities who are accompanied by a support person.

The following terms apply to a person with a disability who is accompanied by support person:

- Metcalfe Golf Club may require a person with a disability to be accompanied by a support person while on the premises in situations where it is necessary due to health and safety concerns.
- Consent from the person with a disability is required when communicating confidential issues related to the person with a disability, in the presence of a support person.
- If a fee is charged for the admission of a support person, the fee will be communicated and posted.

Notice of Temporary Disruptions

Metcalfe Golf Club will publicly notify customers of temporary disruptions of services or facilities. If the disruption is planned the organization will publicly notify customers of the upcoming service disruption in advance of the start of the service disruption.

A notice of temporary disruption will include:

- When the disruption will happen if it is a case where it is planned;
- Steps to take to access alternative methods;
- A description of alternative facilities or services if they are available;
- The reason for the disruption; and
- How long the disruption will last.

The notice may be delivered to the public by the following methods:

- Posting at the main entrances and the source of the disruption;
- Via phone and email notification to regular customers or customers with scheduled appointments;
- The company's website.

Feedback Process

A feedback process regarding the provision of goods and services to persons with disabilities has been established. The manner in which feedback may be provided will be in such a way that best suits the person with a disability.

Metcalfe Golf Club will review all feedback received and respond in a timely manner. If the feedback is of an urgent concern, a response to the person submitting the complaint will be issued as soon as reasonably possible.



Feedback will be provided to:

Rob Howell, General Manager, 1956 8th Line Road, Metcalfe Ontario KOA 2PO, 6138213673 ext 2 (or cell 6134060452), rhowell@metcalfegolf.com

<u>Training</u>

Metcalfe Golf Club will ensure that all employees and applicable third parties who interact with customers are provided with accessibility training. Training will also be required for those individuals who are involved in the development or implementation of customer service policies, practices and procedures.

The training will address:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- The requirements of the Accessibility Standards for Customer Service;
- Information about Company policies and procedures (including this policy);
- Best practice on how to communicate with persons with various types of disabilities;
- Best practice on how to interact with people with disabilities who use assistive devices, require the assistance of a service animal or a support person.

Metcalfe Golf Club will retain a record of all individuals who have completed the required training.

Notice of Availability of Documents and Alternative Formats

Metcalfe Golf Club will post notice of the availability of this policy, other documents prescribed by the Standard and the availability of alternative formats upon request. This information will be provided in our Statement of Commitment, which is posted at a conspicuous location for customers, as well on the company's website.

Information and Communications Standard Policy

POLICY STATEMENT

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Information and Communications Standard set forth under the Accessibility *for Ontarians with Disabilities Act, 2005.* This policy applies to the provision of information and communication services and materials for people with disabilities.

PURPOSE

Metcalfe Golf Club is committed to creating, providing, and receiving information in a way that is accessible to people with disabilities. When requested by a person with a disability Metcalfe Golf and Country Club will provide an accessible form of communication that takes into account the specific needs of the individual. Metcalfe Golf and Club is also committed to ensuring our employees are educated and trained to adhere to this policy. Metcalfe Golf Club will make all reasonable efforts to



ensure that all people are treated and provided information and communication in a manner that is consistent with the principles of the AODA: Dignity, Independence, Equal Opportunity and Integration.

DEFINITIONS

Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

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

Conversion Ready – An electronic or digital format that facilitates conversion into an acceptable format.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- D. Emergency Procedures, Plans or Public Safety Information
- E. Education and Training Resources
- F. Public Libraries
- G. Feedback
- H. Exceptions

A. General Requirements

General requirements apply to the Information and Communications, Employment and Transportation standards and are outlined as follows.

Establishment of Accessibility Policies and Plans

Metcalfe Golf Club will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. Metcalfe Golf Club will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

Metcalfe Golf Club will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

Metcalfe Golf Club will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement the accessibility plan. This status report will be posted on our website and shall be created in an accessible format upon request.



Procuring or Acquiring Goods and Services, or Facilities

Metcalfe Golf Club will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements

Metcalfe Golf Club will provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Metcalfe Golf Club policies, and all other persons who provide goods, services or facilities on behalf of the organization.

Training will be provided to all employees as soon as possible, but no later than required. Training will be provided on an ongoing basis to new employees and as changes to our accessibility policies occur. We will maintain records of who completed the training, including the date of completion.

B. Accessible Formats and Communication Supports

Metcalfe Golf Club will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual. Metcalfe Golf Club will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

C. Accessible Websites and Web Content

Metcalfe Golf Club will ensure that our website and all web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, in accordance with the schedule set out in the regulation. This applies to web content on both the internet and the organization's intranet.

D. Emergency Procedures, Plans or Public Safety Information

Metcalfe Golf Club will address accessibility in our emergency procedures. Metcalfe Golf Club will prepare emergency procedures, plans or public safety information, which is available to the public and will be provided in an accessible format upon request.

E. Education and Training Resources

This section does not apply to Metcalfe Golf Club.

F. Public Libraries

As Metcalfe Golf Club does not operate a public library, this section is not applicable.

G. Feedback Process

Metcalfe Golf Club will ensure processes are in place for receiving and responding to feedback. Metcalfe Golf Club will make these processes accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. Metcalfe Golf Club will notify the public about the availability of these accessible formats.



H. Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Information is regarded as unconvertible where it is not technically feasible to convert, or the technology required to make the conversion is not readily available. In a case where it is determined information is unconvertable Metcalfe Golf Club will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Employment Standard Policy

POLICY STATEMENT

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Information and Communications Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005.* This policy applies to the provision of information and communication services and materials for people with disabilities.

PURPOSE

Metcalfe Golf Club is committed to integrating accessibility into regular workplace processes and to ensure accessibility in the recruitment and selection process and throughout all stages of the employment life cycle. Metcalfe Golf Club is also committed to ensuring our employees are educated on and adhere to this policy. Metcalfe Golf Club will make all reasonable efforts to ensure that all people are treated and provided information and communication in a manner that is consistent with the principles of the AODA: Dignity, Independence, Equal Opportunity, and Integration.

DEFINITIONS

Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

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Conversion Ready - An electronic or digital format that facilitates conversion into an acceptable format

Performance Management – activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.



General Principles

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

- A. General Requirements
- B. Employment Standards Overview
- C. Recruitment, Assessment, and Selection
- D. Accessible Formats and Communication Supports for Employees
- E. Documented Individual Accommodation Plans
- F. Workplace Emergency Response Information
- G. Plans and Processes
- H. Return to Work and Redeployment

A. General Requirements

Establishment of Accessibility Policies and Plans will develop policies governing how it will achieve accessibility through these requirements. Metcalfe Golf Club will post a statement of commitment outlining how it will meet the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will also be available to our employees and the public in an accessible format, upon request.

Metcalfe Golf Club will develop, maintain and implement a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Metcalfe Golf Club will post its accessibility plans on its website and provide the plan in an accessible format upon request. This plan will be reviewed and updated once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee if applicable.

Annual status reports will be prepared to report on the progress of steps taken to implement the accessibility plan and updates will be posted on its website. The plan or reports will be made available in an accessible format upon request.

Informing Employees of Supports

Metcalfe Golf Club shall inform employees of its policies used to support its' employees 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 a disability:

- Provide the information required to new employees as soon as practicable after they begin their employment.
- 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 a disability.

Procuring or Acquiring Goods and Services, or Facilities

Metcalfe Golf Club will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements

Metcalfe Golf Club will provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will also be provided



to individuals who are responsible for developing Metcalfe Golf Club policies, and all other persons who provide goods, services or facilities on behalf of the organization.

Training will be provided to all employees as soon as possible, but no later than required. Training will be provided on an ongoing basis to new employees and as changes to our accessibility policies occur. We will maintain records of who completed the training, including the date of completion.

B. Employment Standards Overview

The Employment Standards regulation will expand Ontario's labour pool by ensuring people with disabilities are welcomed and supported within all workplaces. Employment standards will assist organizations with employment recruitment, providing accessible information, plans for emergencies, individual accommodation, return to work, performance management, and career development and redeployment.

C. Recruitment, Assessment, and Selection

Metcalfe Golf Club will make every reasonable effort to accommodate job applicants who have disabilities. Metcalfe Golf Club shall notify employees and the public about the availability of accommodations for job applicants with disabilities. If a selected applicant requests an accommodation, Metcalfe Golf Club shall consult with the applicant and provide and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability. Successful applicants will be made aware of the policies for accommodating employees with disabilities.

D. Accessible Formats and Communication Supports for Employees

Upon request, Metcalfe Golf Club will make every reasonable effort to provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform a job or position; and
- Information that is generally available to all employees in the workplace.

E. Documented Individual Accommodation Plans

Metcalfe Golf Club will develop and implement where required written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans will include the following:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways an employee can request an evaluation by an outside medical expert, or other experts to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.



F. Workplace Emergency Response Information

Metcalfe Golf Club will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

- Metcalfe Golf Club shall provide individualized workplace emergency response information to employees who have a disability:
- If the disability is such that the individualized information is necessary and the Metcalfe Golf Club is aware of the need for accommodation due to the employee's disability;
- If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- Review the information when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when the Metcalfe Golf Club reviews its general emergency response policies.

G. Plans and Processes

This area speaks specifically to employee performance management, career assessment, development and advancement.

Metcalfe Golf Club will ensure that all plans and processes will account for and respect the accessibility needs of their employees with disabilities when developing and implementing these plans and processes. The plan or process should be developed and implemented with consideration for each employee's (who has a disability) unique needs and capabilities.

H. Return to Work and Redeployment

Metcalfe Golf Club will develop and implement (where required) return to work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work. The return to work process will be documented and include an outline of the steps necessary to facilitate the employee's return to work. The return to work process and plan will be created in consultation with the employee and shall use documented individual accommodation plans.

In the event of a redeployment, Metcalfe Golf Club will take into account the accessibility needs of its employees.