

FARLEY MANUFACTURING INC.

INTEGRATED ACCESSIBILITY STANDARDS REGULATION POLICY

STATEMENT OF COMMITMENT

Farley Manufacturing Inc. is committed to treating all individuals in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of individuals with a disability or disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and by meeting accessibility standard requirements under the *Accessibility for Ontarians with Disabilities Act*.

1. PURPOSE, PLAN AND POLICY STATEMENT

We at Farley Manufacturing Inc. strive to make our facility, employment, information and communications accessible to all individuals with a disability or disabilities. Farley Manufacturing Inc.'s *Accessibility Standards for Customer Service Policy* and *Integrated Accessibility Standards Regulation Multi-Year Plan* are available upon request.

2. ACCESSIBILITY POLICIES AND PLAN APPLICATION

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") is to create a more accessible Ontario by 2025, by identifying, preventing and eliminating barriers that can cause an undue hardship experience by any individual with a disability or disabilities.

The objective of the Integrated Accessibility Standards Regulation Policy ("Policy") is to ensure Farley Manufacturing Inc. meets the requirements of Integrated Accessibility Standard Regulation ("IASR Standard") standards of the AODA and promote the underlying core principles. The 2014-21 *Integrated Accessibility Standards Regulation Multi-Year Plan* ("Plan") outlines the policies and actions that Farley Manufacturing Inc. will put into place to improve opportunities for all individuals with a disability or disabilities. Farley Manufacturing Inc.'s Plan is documented separately and available upon request.

The Policy applies to all Individuals who, on behalf of Farley Manufacturing Inc., are responsible for the development, implementation or oversight of policies, practices and procedures. This includes our management, employees or other third parties. This policy is available in an alternate format or a paper copy upon request.

3. DEFINITIONS

- i. **Accessibility Report** - The report required to be filed pursuant to the standard requirements of the AODA.
- ii. **Accessible Formats** - formats of information that are an alternative to standard print and are accessible to individuals with a disability or disabilities. May include, but not limited to, large print, Braille, audio and electronic formats such as DVDs, CDs.
- iii. **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.

- iv. **Disability/Disabilities** - Has the same definition as provided under the Act and *Human Rights Code*, R.S.O. 1990, c. H.19. Includes physical, mental, learning or developmental disabilities, dysfunctions, or disorders.
- v. **"We, "Our" and "Staff"** - Farley Manufacturing Inc. and its employees, volunteers, agents, contractors and other third parties.

4. CORE PRINCIPLES OF THE POLICY

We endeavor to ensure that the Policy and related practices, policies and procedures are consistent with the following four (4) core principles:

- i. **Dignity** - Individuals with a disability or disabilities should be treated as a valued individual as deserving of accessibility as any other individual.
- ii. **Equality of Opportunity** - Individuals with a disability or disabilities should be given an opportunity equal to that given to others to obtain and benefit from our goods and services, information, communications, employment and accessibility.
- iii. **Integration** - Wherever possible, individuals with a disability or disabilities should benefit from our goods and services, information and communications, employment and accessibility in the same place and in the same or similar manner as any other person. In circumstances where integration does not serve the needs of the person with a disability or disabilities; goods and services, information and communications, employment and accessibility will, to the extent possible, be provided in another way that takes into account the person's individual needs.
- iv. **Independence** – Goods and services, information and communications, employment and accessibility should, where possible, be provided in a way that respects the independence of individuals with a disability or disabilities. To this end, we will be willing to assist a person with a disability or disabilities but will not do so without the express permission of the individual.

5. IMPLEMENTATION

Farley Manufacturing Inc. continues to:

- i. Establish and implement policies, practices and procedures to ensure accessible provision, remove and prevent accessibility barriers of goods and services, information, communications, and employment to Individuals with a disability or disabilities.
- ii. Remove and prevent accessibility barriers to goods and services, information, communications, and employment to individuals with a disability or disabilities.
- iii. Continue accessibility training programs as required by the AODA and IASR Standard.
- iv. Implement the continuation of feedback procedures as required by the AODA and IASR Standard.
- v. File Accessibility Reports as required under the AODA.

6. ACCESSIBILITY AT OUR FACILITY

Individuals with a disability or disabilities have accessibility at our facility by the following:

- a) Use of a wheel chair ramp.
- b) Our facility provides accessibility to front door visitor parking spaces.
- c) Accessibility to a wide, four step stair case constructed with support handles. The stair case leads to a large barrier free front door platform.
- d) A main floor restroom with wheel chair accessibility is available.
- e) A lap top accessible to accommodate communications when necessary.
- f) Public documentation and emergency information will be posted publicly within an accessible area of our facility when required .
- g) Our IASR Policy is posted on a public employee bulletin board and is available in other accessible formats upon request.
- h) In the event of a service disruption at our facility, we will notify our staff and public by a written memo within our facility and electronically (email/website) of the service disruption and alternative accessibility available.
- i) Farley Manufacturing employs an open-door policy for any requests or suggestions relating to making our facility more accessible.

If there is a barrier that prevents accessibility on our premises we will ask the person how he/she can be accommodated and what alternative method would be more accessible to him/her. We will make all efforts to provide an alternative means of assistance to the person with a disability or disabilities.

7. ASSISTIVE DEVICES

Individuals with a disability or disabilities are permitted to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our goods and services, information and communications, employment and accessibility.

8. SUPPORT INDIVIDUALS

Individuals with a disability or disabilities may enter premises owned and/or operated by Farley Manufacturing Inc. with a Support Person and have access to the Support Person while on the premises. Farley Manufacturing Inc. may require a person with a disability or disabilities 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.

9. ACCESSIBLE EMERGENCY INFORMATION

Farley Manufacturing Inc. is committed to providing our management, employees, members of the public, clients or other third parties with publicly available emergency information in an accessible manner. We will provide employees with a disability or disabilities with individual emergency response information when necessary or upon request as defined by the IASR Standard. Accessible Emergency Information at Farley Manufacturing Inc. includes, but is not limited to the following:

- a) Emergency procedures or public safety information posted or updated within our facility will be provided in an accessible area. Accessible formats or appropriate communication supports will be provided upon request.
- b) Notify, via telephone or email, members of the public, clients or other third parties scheduled to visit the Farley Manufacturing Inc. facility that assistance is available if required in the event of an emergency. If the visitor requires assistance, with the visitor's consent, Farley Manufacturing Inc. shall provide the information for emergency purpose to a staff individual designated to provide assistance to the visitor during an emergency.
- c) Farley Manufacturing Inc.'s *Employee Handbook* will be updated as required to notify all staff members an *Individualized Workplace Emergency Response Information* procedure is available. Copies of the *Employee Handbook* will be given to all staff members upon updates. A copy of the *Employee Handbook* will be provided in an accessible format upon request.
- d) Provide *Individualized Workplace Emergency Response Information* as soon as practicable to known employees with a disability or disabilities or upon request. For employees requiring emergency assistance, with the employee's consent, Farley Manufacturing Inc. shall provide the information to an individual designated to provide assistance to the employee during an emergency. All *Individualized Workplace Emergency Response Information* will be signed and dated by the employer and employee and recorded confidentially for the duration of the employee's employment.
- e) Farley Manufacturing Inc.'s *Employee Information/ Emergency Contact* internal office form includes an area to record information for any employee requiring assistance in the event of an emergency. The area is to be filled out voluntarily and the information is to be kept confidential with the exception of consent from the individual.

10. TRAINING AND RECORDS

Farley Manufacturing Inc. will provide training to employees and all other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to individuals with a disability or disabilities as required under the IASR Standard. Training will be provided ongoing and in a way that best suits the duties of employees and all other staff members.

- a) Each employee and all other staff members are required to watch the eLearning video provided by the Ontario Human Rights Commission (OHRC) "*Working Together: The Code and the AODA*" Part 1. - Part 5. and complete the corresponding quizzes. Once the quizzes are passed the employee or other staff member will sign a "*Integrated Accessibility Standards Regulation*" training log record to confirm training has been completed.

- b) Training will be provided to all new or re-entering employees at Farley Manufacturing Inc. and to whom this Policy applies to for the continuation of Farley Manufacturing Inc.'s implemented training programs as required under the AODA. Each new employee or other staff member who has not previously completed the required training under the AODA including but limited to the "Accessibility Standards for Customer Service" training (separate policy available upon request) and the "Integrated Accessibility Standards Regulation" training is required to complete all training as soon as practicable after he or she is assigned the applicable duties.
- c) Records of the training provided, including the training protocol, the dates on which the training is provided and the name of individuals to whom the training is provided to shall be maintained in accordance to the requirements of the IASR Standard.

11. INFORMATION AND COMMUNICATIONS

Farley Manufacturing Inc. is committed to meeting the communication needs of individuals with a disability or disabilities. We welcome feedback and will consult with individuals with a disability or disabilities confidentially to determine their information and communications needs. Farley Manufacturing Inc. will implement information and communication procedures to comply with the requirements of the IASR Standard.

11.1 Accessible Formats and Communication Supports

Farley Manufacturing Inc. will take the following steps upon request to provide or arrange for the provision of accessible formats and communication supports for individuals with a disability or disabilities:

- a) Consult with the individual making the request to determine a suitable resource of an accessible format or communication support.
- b) Provide an accessible format or communication support in a timely manner, at a cost that is no more than the regular cost chargeable to other individuals.
- c) Farley Manufacturing Inc. shall provide information and guidance to our employees and anyone who interacts with the public on our behalf on obtaining information in accessible formats, including but not limited to types of accessible formats that we are able to provide, upon request.

11.2 Website

- a) Ensure website contains accessible formats such as alternative large fonts and accessibility with a keyboard.
- b) Consult with an outsourced web developer familiar with the WCAG 2.0, Level A , IASR Standard requirements to implement and update website

11.3 Feedback Procedure

Farley Manufacturing Inc. will take the following steps to ensure existing feedback processes are accessible to individuals with a disability or disabilities upon request.

- a) *Feedback/Comments* area available on our website as an alternative public accessibility area for communication other than the direct email address present on the website.
- b) *Feedback Process Information* available within the *Feedback/Comments* area on the website to make the feedback process accessible to the public.
- c) Continue to provide an accessible medium of communication at the Farley Manufacturing Inc. facility such as a computer laptop for an individual with a disability or disabilities to utilize.
- d) Continue to employ an *Open Door Policy* for feedback communication for all staff members including individuals with a disability or disabilities.
- e) If there is a physical, technological or other type of barrier that prevents feedback processes to be accessible, Farley Manufacturing Inc. will first endeavor to remove the barrier. If the barrier is unable to be removed we will accommodate and request what alternative of communication would be more accessible to the individual.

11.4 Feedback Process Information

Feedback can be provided to Farley Manufacturing Inc. in the following ways:

- i. In person at Farley Manufacturing Inc.
- ii. By telephone at Farley Manufacturing Inc.
- iii. In writing or facsimile to Farley Manufacturing Inc.
- iv. Electronically to Farley Manufacturing Inc. or on disk.
- v. Farley Manufacturing Inc. *Feedback/Comments* area on www.thefarleygroup.com web link.

Farley Manufacturing Inc.
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11.5 Feedback Process Information - Responding to Feedback/Comments/Complaints

- a) Farley Manufacturing Inc. will respond to feedback/comments/complaints within two (2) weeks, ten (10) business days of the date that the feedback/complaint is received.
- b) In certain circumstances we may be required to take more action to effectively address the feedback/comments/complaints. In such circumstances the individual will receive an acknowledgement that the complaint has been received within two (2) weeks, ten (10) business days and we will respond to the complaint as soon as is practicable thereafter.

11.6 Publicly Available Information

Farley Manufacturing Inc. will take the following steps to make sure all publicly available information is made accessible upon request.

- a) Our *Integrated Accessibility Standards Regulation Policy, Multi-Year Accessibility Plan* and the *Accessibility Standard for Customer Service Policy* shall be provided publicly in an accessible format upon request.
- b) Emergency procedures, plans or public safety information posted publicly will be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.
- c) Provide documents, or information contained in documents, upon request, to an individual with a disability or disabilities in a format required under the IASR Standard that takes the individual's disability or disabilities into account.
- d) Notify the public of the availability of policies, accessible formats and communication supports upon request on our website.
- e) Post Farley Manufacturing Inc.'s *Statement of Commitment and Feedback Process Information* on our website.

*All communication supports and assistive devices are permitted for accessibility on the premises of Farley Manufacturing Inc.

13. EMPLOYMENT

Farley Manufacturing Inc. is committed to fair and accessible employment practices. We will take the necessary steps to accommodate and take into account the accommodation for accessibility needs of employees with disabilities when Farley Manufacturing Inc. employs performance management and career development.

Farley Manufacturing Inc. will take the following steps to notify applicants and staff that, upon request, Farley Manufacturing Inc. will accommodate individuals with a disability or disabilities during the recruitment, assessment processes and during employment.

- a) Farley Manufacturing Inc. will notify applicants we accommodate individuals with a disability or disabilities upon request in public and internal job postings.
- b) Hired individuals at Farley Manufacturing Inc. will be notified we accommodate individuals with a disability or disabilities upon request in a formal job offer.
- c) Acquire consent in writing from an individual with a disability or disabilities to share necessary accommodation/emergency response information with other designated staff members.
- d) Include notification in our *Employee Handbook* Farley Manufacturing Inc. will accommodate individuals with a disability or disabilities upon request.

- e) Review this IASR Standard Policy with management and applicable staff members.
- f) Farley Manufacturing Inc. will ensure that new employees are made aware of AODA policies and how to obtain them as soon as practicable after the beginning of their employment.
- g) Employees will be notified by email and/or public posting when the ISAR Policy is revised or updated.

Farley Manufacturing Inc. will take the following steps to develop and put in place a process for individual accommodation plans and return-to-work policies for employees that have been absent due to a disability or disabilities.

- a) Review *Return-to-Work Process* and *Accommodation Plans* annually to ensure protocols are appropriate to accommodate the needs of the employee to safely and effectively return to work.
- b) A documented *Individual Accommodation Plan* for employees requiring a disability-related accommodation to safely and effectively return to work will be reviewed with employee, agreed upon and filed in the employee's file.
- c) Implement an acknowledgement form to be signed and dated by the individual requiring accommodation to return to work due to a disability or disabilities which will acknowledge the accommodations are agreeably suitable.
- d) Establish an *Individual Accommodation Plan/ Return-to-Work Policy* in writing to include our following *Return-to-Work Process*.

14. ACCESSIBILITY BARRIERS

Farley Manufacturing Inc. will take the following steps to prevent and remove other Accessibility Barriers identified:

- a) Farley Manufacturing Inc. shall be open to working with our guests or employees to facilitate a solution when a barrier to accessibility is encountered.
- b) Review and evaluate IASR Standard Policy, Multi-Year Accessibility Plan and Accessibility Barriers annually to highlight updates and report any significant accessibility barriers prevented or removed in our business practices.
- c) Post publicly on our website IASR Standard Policy and Multi-Year Accessibility Plan are available upon request.
- d) Update Multi-Year Accessibility Plan at least once every five (5) years as required under the IASR Standard and assess goals that have been achieved within the Multi-Year Accessibility Plan.
- e) Report Accessibility achievements every three (3) years as required by the IASR Standard.
- f) Meet the Accessibility Standards and take into account the needs of accessibility for individuals with a disability or disabilities if building or making modifications to public spaces.
- g) Take into account and respond to received accessibility and accommodation *Feedback* as outlined in this Policy.
- h) Take into account accessibility barriers for individuals with a disability or disabilities when planning social events at the Farley Manufacturing facility.

- i) Continue to keep accessibility ramp and entrances barrier free.
- j) If there is a physical or other type of barrier that prevents accessibility we will provide an alternative means of accommodation to individuals with a disability or disabilities upon request.
- k) Continue to permit and encourage the use of Assistive Devices, Service Animals and Support Persons on our premises.
- l) Provide ongoing Accessibility Standards Training to all staff members.
- m) In the event of a service disruption at our facility, we will notify our staff and public by a written memo within our facility and electronically (email/website), as soon as reasonably possible, of the service disruption and alternative accessibility available.

Modifications/More information:

This Policy may be modified from time to time. For more information on this IASR Standard Policy and Multi-Year Accessibility Plan, please contact **Brenda Tilley** at:

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***Accessible formats of this document are available free upon request.**