



ACCESSIBILITY POLICY

This policy is consistent with the Integrated Accessibility Standards made under the *Accessibility for Ontarians with Disabilities Act, 2005*, as amended from time to time (the "AODA"), and which apply to the Valecraft Homes (2019) Ltd. ("Valecraft").

Purpose

Valecraft is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under *the Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws.

Valecraft is committed to meeting its current and ongoing obligations under the Ontario *Human Rights Code* respecting non-discrimination. Valecraft understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario *Human Rights Code* or obligations to people with disabilities under any other law.

Valecraft is committed to excellence in serving and providing goods, services or facilities to all customers. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

Applicability

This policy applies to employment with Valecraft and to all Valecraft services that are provided externally to the public or to third parties. This policy applies to all employees and students of Valecraft, as well as partners, agents, volunteers, clients, and visitors to Valecraft.

Definitions

For the purpose of this policy:

Disability means:

- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, 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;
- 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 understating or using symbols or spoken language;
- d) A mental disorder; or
- 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*.



Guide dog means a dog trained as a guide for a blind person and having the qualifications prescribed by regulation.

Service animal means an animal for a person with a disability where the animal can be readily identified as one that is being used by the person for reasons relating to their disability (as a result of visual indicators, such as the vest or harness worn by the animal, or where the person provides documentation from a designated regulated health professional confirming that they require the animal for reasons relating to the disability).

Support person means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care or medical needs, or with access to goods, services or facilities.

Policy

1. Training for Employees:

Valecraft will train its employees, any volunteers or students, and any other individuals who provide services to the public on Valecraft's behalf, as well as its employees who participate in developing policies, practices and procedures governing the provision of services to the public, on the provision of its services to persons with disabilities, other Ontario accessibility standards and aspects of the Ontario *Human Rights Code* that relate to persons with disabilities.

The training will be provided as soon as practicable after an individual commences their duties, will relate to that individual's specific role, and will include the following topics:

- The purpose of the *Accessibility for Ontarians with Disabilities Act*, and the requirements of the Customer Service Standards and Integrated Accessibility Standards;
- Valecraft's policies, practices and procedures relating to the Customer Service Standards and Integrated Accessibility Standards, as are relevant to the employee's work responsibilities;
- How to interact and communicate with persons with various types of disabilities;
- How to interact and communicate with persons who use an assistive device or require the assistance of a guide dog, service animal or support person;
- How to use any equipment or devices available on-site or otherwise that may help with the provision of goods, services or facilities to persons with disabilities;
- What to do if a person with a disability is having difficulty accessing Valecraft's goods, services or facilities; and
- The Ontario *Human Rights Code* as it pertains to persons with disabilities.

"As soon as practicable" means promptly after the individual starts their duties, taking into account any necessary arrangements or circumstances. While there is an intention to deliver the training quickly, the exact timing may vary based on practical considerations related to the individual's specific role.

Training specifically includes review of the Accessibility Standard for Customer Service Training Manual and completion of the corresponding Questionnaire.



Valecraft will provide training on an ongoing basis whenever changes are made to Valecraft's policies, practices or procedures governing the provision of goods, services or facilities to persons with disabilities. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Training will be provided onsite in-person in an orientation session or via mandatory online modules, as the circumstances require in a way that best suits the duties of employees, volunteers and other staff members.

2. Assistive Devices:

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We 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, services or facilities.

3. Communication

We communicate with people with disabilities in ways that take into account their disability. We will work with the person with disabilities to determine what method of communication works for them.

4. Service Animals:

A person with a disability is welcome to be accompanied by a guide dog or other service animal when on Valecraft's premises that are open to the public and third parties.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario



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It is the responsibility of the person using the service animal to ensure that the service animal is kept under control at all times.

In certain cases, Valecraft may be required by law to exclude service animals on the premises for health and safety reasons but only if, after consulting with the person with a disability and considering health or safety reasons based on available evidence, Valecraft determines that it is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises, and there is no other reasonable way to protect the health and safety of the person with a disability or others on the premises. In the event that a service animal is excluded by law from the premises, Valecraft will explain why the animal is excluded and will discuss with the customer another way of providing goods, services or facilities.

5. Support Persons:

A person with a disability may enter Valecraft's premises with a support person and be accompanied by the support person while on the premises.

In certain cases, Valecraft may require a person with a disability to be accompanied by a support person when on the premises but only if, after consulting with the person with a disability and considering health or safety reasons based on available evidence, Valecraft determines that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises, and there is no other reasonable way to protect the health and safety of the person with a disability or others on the premises.

6. Notice of Temporary Disruption:

Valecraft will promptly notify the public in the event of a planned or unexpected disruption in the goods, services, or facilities for persons with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be clearly posted at the main entrance of the affected Valecraft location or communicated by such method as is reasonable in the circumstances (on Valecraft's website). It is recognized that the ability to provide appropriate notice of a disruption may be limited in cases of an emergency causing the temporary disruption.

7. Feedback Process:

Valecraft welcomes any feedback regarding the methods it uses to provide goods, services, or facilities to persons with disabilities, and this feedback process itself. Clients and supporters who wish to provide feedback can use the on-site suggestion box, online feedback form or formal complaints procedure. Individuals may provide their feedback in person, by telephone (613-837-1104), in writing or by email (info@valecraft.com) to the Accounting & Office Manager or other appropriate person.

Every complaint received will be reviewed and assessed, and directed to the appropriate person for action, if necessary. Customers can expect to hear back within five business days. Where possible, the issues in the complaint will be addressed. If a complaint cannot be addressed, the person making the complaint will be advised.



Valecraft will ensure that this feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

8. Notice of Availability of Documents

Valecraft notifies the public that documents related to accessible customer service, are available upon request by posting a notice on its website. Valecraft will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

9. Accessible Information and Communication:

Valecraft is committed to meeting the communication needs of people with disabilities. We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities with sensitivity and in ways that take into account their disability. We are available to answer any questions clients or others may have in person, by telephone, or via email. When asked, we will arrange for the timely provision of accessible formats and communication supports where necessary, at no additional cost. This includes information about our company, goods, services, and facilities, as well as public safety information, and any feedback processes that may be offered from time to time. We will consult with people with disabilities to determine their information and communication needs, taking into account the person's accessibility needs due to disability.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If Valecraft determines that information or communications are unconvertible, we shall provide the requestor with an explanation as to why the information or communications are unconvertible, and a summary of the unconvertible information or communications.

Valecraft will post a notice on its website notifying the public of the availability of accessible formats and communication supports. We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

10. Employment:

Valecraft is committed to fair and accessible employment practices. We will notify employees, job applicants and the public through any job posting that, when requested, Valecraft will accommodate people with disabilities during the recruitment, assessment, and selection process, and when employees are hired. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

Valecraft will notify successful applicants of our accommodation policies at the time they are offered employment. We notify staff that supports are available for those with disabilities as soon



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as practicable after they begin their employment. We will provide updated information to employees whenever there is a change to Valecraft's policies, practices or procedures governing the accommodation of employees with disabilities.

When asked, Valecraft will provide accessible formats and communication supports for information necessary for employees with disabilities to do their job, and for information that is generally available to all employees. We will consult with employees with disabilities when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability.

When necessary, Valecraft will provide employees with disabilities with individualized emergency response information as soon as practicable after Valecraft becomes aware of the employee's need for accommodation due to disability, taking into account practical considerations related to the situation and the employee's specific needs. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency. Individualized emergency response information, if any, will be reviewed if the employee changes work locations, when the employee's accommodation needs or plans are reviewed, and whenever Valecraft reviews its general emergency response policies.

Valecraft will take into account the accessibility needs of employees with disabilities when using its performance management and career development and advancement processes, if any.

11. Design of Public Spaces

Valecraft will comply with the Accessibility Standards for the Design of Public Spaces if it builds or makes any major modifications to its reception desk or waiting area, or any other public space covered by that Accessibility Standard.

Modifications to This or Other Policies

Changes will not be made to this policy unless the impact of the changes on persons with disabilities has been considered. Any Valecraft policy that does not respect and promote the dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed as required.

This document is publicly available. Accessible formats are available upon request.

Updated on October 30, 2024.