



ACCESSIBILITY PLAN & POLICIES: 2017 TO 2021

Effective Date: November 1, 2017

This document outlines the policies and actions that The University of Western Ontario Research & Development Park (“Western Research Parks”) will put in place to improve opportunities for people with disabilities and is intended to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)*.

This plan and related policies apply to all related operations of Western Research Parks including The Collider at Western Advanced Manufacturing Park and Windermere Manor Ltd.

1. Statement of Commitment

Western Research Parks is committed to treating all people 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 people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

2. Customer Service

All goods and services provided by Western Research Parks shall follow the principles of dignity, independence, integration and equal opportunity.

A. Provision of Goods and Services

Western Research Parks will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways and at their own pace when accessing goods and services, as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;

- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Western Research Parks.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure access to goods and services.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas:

A customer with a disability that is accompanied by a guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law, Western Research Parks will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Western Research Parks may request verification from the customer.

Verification Methods:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability; or
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies:

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Western Research Parks will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a customer with a disability is accompanied by a support person, Western Research Parks will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations Western Research Parks will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, prior consent will be obtained from the customer to discuss the matter(s) in the presence of the support person.

3. Information & Communication

Western Research Parks is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

A. Emergency Information

Western Research Parks will provide customers and clients with publicly available emergency information in an accessible way, upon request.

Western Research Parks will also provide employees with disabilities with individualized emergency response information when necessary. Supervisors will work with employees to develop emergency response information that meets their needs and, with the employee's consent, share the necessary information with the individual(s) designated to assist them in an emergency. Emergency response information will be reviewed when:

- the employee changes work locations; or
- the employee's overall accommodation needs are reviewed; or
- Western Research Parks' general emergency response policies are reviewed.

B. Other Publicly Available Information

Western Research Parks will provide publicly available information and communications (e.g. reports, brochures, menus, signage, comment cards, announcements, websites, emails, etc.) in an accessible manner to people with disabilities, upon request.

C. Websites

When new websites are launched or if any significant changes are made to existing websites, Western Research Parks will ensure the websites and web content published conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A.

All Western Research Parks' websites and web content will conform to WCAG 2.0, Level AA by January 1, 2021.

When requested, Western Research Parks will work with individuals to make any content on its websites accessible.

D. Format of Information

Western Research Parks will work with individuals with disabilities to determine their accessibility needs. The format of the accessible information or communication supports will be determined based on the accessibility needs of the individual requesting the information, the type of information, the current format of the information and the resources available. Accessible formats and communication supports may include, but are not limited to:

- Reading written information to a person directly
- Large print
- Text transcripts of audio or visual information
- Handwritten notes instead of spoken word
- Information written in plain language
- An electronic document formatted to be accessible for use with a screen reader

In rare cases where it is not possible to provide information in an accessible format, Western Research Parks will provide an explanation and will provide a summary of the information in an alternate format.

E. Availability of Information

Once a request is received, Western Research Parks will provide information in an accessible format as soon as possible. There will be no additional charge to provide an accessible version of publicly available information.

F. Notice

Customers, clients and employees will be advised that Western Research Parks will provide information in an accessible format upon request. Notice(s) will be posted on Western Research Parks' website(s), on signage and on staff bulletin boards, as appropriate.

4. Feedback

Western Research Parks will provide customers and clients with the opportunity to provide feedback in an accessible way. Information about the feedback process will be readily available to all customers and notice of the process will be made available upon request.

Feedback can be provided verbally (in person or by telephone) or in written format (hand written, delivered, or email).

Customers or clients who wish to provide feedback verbally can do so to any Western Research Parks employee.

Customers or clients that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Feedback related to **Western Discovery Park** operations and/or **The Collider at Western Advanced Manufacturing Park** can be submitted to:

**Western Research Parks
999 Collip Circle, Box 18
London, Ontario, N6G 0J3**

Phone: (519) 858-5198

Email: info@westernresearchparks.ca

Feedback related to **Windermere Manor** operations can be submitted to:

Windermere Manor
200 Collip Circle
London, Ontario, N6G 4X8

Phone: (519) 858-1391

Email: catering@windermere.uwo.ca

5. Training

Western Research Parks will provide training on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities to the following:

- a) all Western Research Parks employees;
- b) individuals who are involved in the development and approval of Western Research Parks policies, practices and procedures; and
- c) individuals who provide goods, services and facilities on behalf of Western Research Parks.

A. Training Format and Provisions

Training may be provided via in-person training sessions, online training modules, and/or instructional handouts and the training will be tailored to needs of the individual. Regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act (AODA).
- A review of the regulations under the Integrated Accessibility Standards Regulation (Ontario Regulation 191/11), including a review of the Accessibility Standards for Customer Service (Ontario Regulation 429/07).
- A review of the requirements under the Ontario Human Rights Code, as it relates to people with disabilities.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal;
 - require the use of a support person.

- Instructions on how to use equipment or devices that are available at Western Research Parks' premises or that may be provided to help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing Western Research Parks' services.
- A review of Western Research Parks' policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

B. Training Schedule

Western Research Parks will provide training as soon as practicable. Training will be provided during orientation to new employees who deal with the public or act on Western Research Parks' behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

C. Record of Training

Western Research Parks will keep a record of training that includes the dates training was provided and a list of employees who attended the training.

6. Employment

Western Research Parks is committed to establishing fair and accessible employment practices.

A. Accessible Hiring Practices

Applicants for employment will be notified that Western Research Parks will provide accommodation during the hiring process. This may include statements in internal and external job postings as well as through direct notification to applicants, either in-person, by phone or via email during the application and selection/interview processes. As well, applicants will be consulted on how to best meet their needs and will be notified of Western Research Parks' policies regarding accessibility at the time an offer of employment is made.

B. Information about Policies for Supporting Employees with Disabilities

At the time of hire, all employees will be informed of Western Research Parks' policies to support employees with disabilities. This will include notification that job accommodations are available, if required.

C. Accessible Formats and Communication Supports

Upon receiving a request for accommodation, Western Research Parks will consult with the employee with a disability to provide the most appropriate accessible formats and communication supports for work-related information (including emergency procedures, information required for an employee to perform his or her job and information generally available to all employees). The format of the accessible information or communication supports will be determined based on the accessibility needs of the employee requesting the information, the type of information, the current format of the information and the resources available.

D. Individual Accommodation Plans

Western Research Parks will follow the steps below for developing documented accommodation plans for employees with disabilities:

i. **Identify the Need for Accommodation**

The need for accommodation will be identified, either by an employee directly, by the employee's supervisor, or by a third party (e.g. the employee's health care provider). Employees may request accommodation by contacting their supervisor.

ii. **Initial Meeting**

An initial meeting will be held in confidence with the employee, the employee's supervisor(s) and the Director, Finance & Administration (or designate). The employee is expected to cooperate by providing sufficient details in order to determine his or her accommodation needs.

iii. **Temporary Accommodation**

Where possible, the supervisor may offer the employee temporary accommodation within the employee's current position. The purpose of this temporary accommodation is to allow the employee to continue to work safely while an appropriate longer-term solution is developed and substantiating documentation is gathered and assessed. The temporary accommodation may last no more than ten (10) working days and is not an indication or commitment on behalf of Western Research Parks to continue to provide such accommodation in the future.

iv. **Gather Medical Information**

The Director, Finance & Administration (or designate) may request medical documentation and/or input from external experts to assist in determining the appropriate accommodation requirements. In such cases, the employee is expected to sign any necessary consent forms to permit enquiries and the release

of information. Information obtained may include an assessment of the employee's current condition, any limitations or restrictions related to the employee's essential job duties, working hours etc., whether the disability is permanent or temporary, how long accommodation may be required (for temporary disabilities only), and an assessment of the employee's capabilities with regard to alternate positions.

Any personal information obtained from or about the employee will be held in the strictest confidence and will only be released with the employee's consent or if required by law. The Director, Finance & Administration (or designate), in consultation with the employee's supervisor, will ensure that there is sufficient medical information to validate the disability and to make the appropriate accommodation assessment.

v. Review Accommodation Options

The supervisor, working in conjunction with the employee, will review each of the essential duties of the employee's position as they relate to the employee's abilities and/or limitations and will make every reasonable effort to identify suitable accommodation, to the extent that it does not cause undue hardship.

If accommodation cannot be provided within the employee's own job, suitable alternate work in other department(s) will also be considered. The supervisor must consult with the Director, Finance & Administration before determining that accommodation cannot be made because it would constitute an undue hardship.

vi. Develop an Accommodation Plan

If a suitable accommodation option has been identified, a meeting will be held between the employee, the employee's supervisor and the Director, Finance & Administration (or designate) to develop a written Accommodation Plan outlining the following:

- Description/details of the accommodation
- Parties responsible for implementing/monitoring the accommodation
- The impact on co-workers and the plan for communicating such impact
- The timelines for implementing the accommodation
- The duration of the accommodation, and
- The nature and timelines of any required follow-up evaluation

Within three (3) working days of the meeting, the supervisor will prepare a written Accommodation Plan, which will be provided to the employee in an appropriate accessible format for review and acceptance. The Accommodation Plan will then

be signed by both the employee and the supervisor and a copy will be kept in the employee's human resources file.

vii. Implementation & Monitoring

Once the Accommodation Plan has been finalized, it will be implemented as quickly as possible, in accordance with the timelines outlined in the Plan. Accommodation Plans will be reviewed for effectiveness and updated, at minimum, on an annual basis or when:

- the employee's essential job duties or work locations change; or
- the employee's accommodation needs change.

E. Return to Work Process

Western Research Parks will make every reasonable effort to encourage and support a return to work by employees who have been off work as a result of a disability. The process outlined below will be employed to help employees who require accommodation upon return to work:

i. Employee Communication

In the event that the nature of a disability results in time off work, the employee will contact his or her supervisor to advise them of the length of the expected absence and to begin to discuss return to work and any anticipated accommodation that may be necessary upon return. The supervisor will maintain telephone and/or electronic contact with the employee on a weekly basis for the first six (6) weeks of the absence and at suitable intervals beyond this time. The employee is responsible for keeping the supervisor advised of any changes in his or her disability.

ii. Initiate the Return to Work Process

The employee must notify his or her supervisor both verbally and in writing when the employee is ready to return to work. The employee must also provide sufficient medical information verifying his or her ability to return to work and clearly outlining any limitations, restrictions or accommodations that may be required upon return.

iii. Develop a Return to Work Plan

The supervisor will then work with the employee to develop a Return to Work Plan, following the procedures outlined in Steps (ii) to (vi) of Section D above (Individual Accommodation Plans).

iv. **Implementation & Monitoring**

Once the Return to Work Plan has been finalized, it will be implemented as quickly as possible, in accordance with the timelines outlined in the Plan. The supervisor will meet with the employee on a weekly basis or as frequently as necessary to monitor the employee's progress and the effectiveness of the accommodations made. Return to Work Plans will be updated when:

- the employee's essential job duties or work locations change; or
- the employee's accommodation needs change.

F. Performance Management, Career Development and Job Changes

Western Research Parks will ensure:

- i. Employee performance reviews take into account the accessibility needs of employees with disabilities. As well, Western Research Parks will ensure supervisors look at the difference between disability-related issues on the job and performance-related issues and are aware of their opinions and attitudes that might influence their view of employees with disabilities.
- ii. If an employee with a disability is offered the opportunity for advancement, Western Research Parks will provide the accommodations needed to help them succeed, including making sure any training and development programs are accessible to persons with disabilities.
- iii. If an employee is reassigned, the needs of the employee with a disability will be taken into account and the employee's accommodation plan and supports will be transferred upon reassignment.

7. Design & Maintenance of Public Spaces

Western Research Parks is committed to designing, developing and maintaining public spaces that are accessible to individuals with disabilities. Relevant public spaces include exterior paths of travel (i.e. sidewalks and walkways), parking lots and service counters.

A. New or Redeveloped Public Spaces

Western Research Parks will meet relevant accessibility standards when constructing new public spaces or making major modifications to existing public spaces.

B. Preventative Maintenance

Western Research Parks shall apply best practices in the preventative maintenance of accessible elements in public spaces. These procedures include performing inspections of accessible elements on an annual basis (at minimum), after storms or other events that might affect the accessible element, or upon receiving a report of damage to and/or impairment of the accessible element.

C. Emergency Maintenance

Western Research Parks shall apply best practices in the emergency maintenance of accessible elements with active response once notified of damage to and/or impairment of accessible elements.

D. Repairs

Repairs and/or upgrades necessary to maintain accessible elements shall be completed as soon as practicable.

8. Notice of Disruptions to Facilities or Services

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Western Research Parks. In the event of any temporary disruptions to facilities (including accessible elements in public spaces) or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notification Requirements:

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- the goods or services that are disrupted or unavailable;
- the reason for the disruption;
- the anticipated duration; and
- a description of alternative services or options

Notifications Options:

When disruptions occur, Western Research Parks may provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption; or
- contacting tenants in the building with the service disruption; or
- contacting guests with appointments or event bookings in the building with the service disruption; or
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.