



2.15.50 – Accessibility Standards

1. **POLICY**

VARI-FORM 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.

2. **PURPOSE**

The following policy is adopted in accordance with Regulation 191/11: Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005.

3. **SCOPE**

This policy applies to all Vari-Form employees, and volunteers.

4. **RESPONSIBILITIES**

It is the responsibility of the managers, immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.

It shall be the responsibility of the Human Resources Department to ensure that all employees receive proper training.

5. **DEFINITIONS**

Disability: Shall mean the same as the definition of a disability found in the Ontario Human Rights Code. Specifically, “disability” is defined as: “Disability” covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time. There are physical, mental and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, drug and alcohol dependencies, environmental sensitivities, and other conditions.

6. **PROCEDURES**

Training

- We are committed to training all staff and volunteers in accessible customer service, other Ontario’s accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.
- In addition, we will train:
 - all persons who participate in developing the organization’s policies; and
 - all other persons who provide goods, services or facilities on behalf of the organization
- Training of our employees and volunteers on accessibility relates to their specific roles.
- Training includes:
 - purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
 - our policies related to the Customer Service Standards
 - how to interact and communicate with people with various types of disabilities
 - how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person



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- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.
- We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.
- We maintain records of the training provided including the dates on which the training was provided and the individuals to whom it was provided.

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 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.
- Devices at Vari-Form may include earmuffs, computer enhancement and powered-operated door.

Communication

- We communicate with people with disabilities in ways that take into account their disability. This may include the following: documents, telephone, text, email, in person meetings.
- We will work with the person with disabilities to determine what method of communication works for them.

Service Animals

- We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.
- 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 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.
- If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:
 - explain why the animal is excluded
 - discuss with the customer another way of providing goods, services or facilities
- Service animals are prohibited from production floor that may include but not limited to production, quality, shipping, maintenance, stores.

Support Persons

- A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.



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- Fee/fare will not be charged for support persons.
- In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability and/or others on the premises
- Before making a decision, this organization name will:
 - consult with the person with a disability to understand their needs
 - consider health or safety reasons based on available evidence
 - determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

Notice of Temporary Disruption

- In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization will notify customers promptly. This clearly posted notice will include information about
 - the reason for the disruption,
 - its anticipated length of time, and
 - a description of alternative facilities or services, if available.
- The notice will be made publicly available by a poster on the entry point.

Feedback Process

- Vari-Form welcomes feedback on how we provide accessible customer service. Customer and employee feedback will help us identify barriers and respond to concerns.
- Feedback may be provided in the following ways:
 - by telephone number: 519-245-5200 or
 - by email hr@variform.com or
 - by mail at 233 Lothian Ave, Strathroy, ON, N7G 4J1 - Attn: Human Resources
- All feedback, including complaints, will be handled by the Human Resources Department and individuals will be advised of any resulting actions within 15 business days.

Notice of Availability of Documents

- Vari-Form 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.

Self-service Kiosks

- Vari-Form does not have public self-service kiosks. We will incorporate accessibility features/consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

Procurement

- We incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks. If it is not possible and practical to do so, we will provide an explanation upon request.



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Information and Communications

- 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 in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:
 - in a timely manner, taking into account the person’s accessibility needs due to disability; and
 - at a cost that is no more than the regular cost charged to other persons.
- We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization 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.
- We notify the public about the availability of accessible formats and communication supports by phone or email.
- We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario’s accessibility laws.

Employment

Recruitment

- We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring.
- 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.
- We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

Informing Employees of Support

- We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment.
- We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee’s accessibility needs due to a disability.
- We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability.
- We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:
 - information that is needed in order to perform the employee’s job; and
 - information that is generally available to employees in the workplace

Workplace Emergency Response Information

- Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee’s consent, we will provide workplace



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emergency information to a designated person who is providing assistance to that employee during an emergency.

- We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.
- We will review the individualized workplace emergency response information:
 - when the employee moves to a different location in the organization;
 - when the employee's overall accommodations needs or plans are reviewed; and
 - when the employer reviews its general emergency response policies.

Documented Individual Accommodation Plans

- We have a written process to develop individual accommodation plans for employees.

Return to Work

- We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Performance Management, Career Development and Redeployment

- Our performance management, career development and redeployment processes will take into account the accessibility needs of all employees.

Design of Public Spaces

- We will meet accessibility laws when building or making major changes to public spaces. Our public spaces may include parking lots and reception.

Multi-Year Accessibility Plan

- Vari-Form has established a Multi-Year Accessibility Plan outlining Vari-Form strategy to meet the requirements under the act. See Appendix

Changes to Existing Policies

- Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.
- This document is publicly available. Accessible formats are available upon request.

7. **REFERENCES**

Ontario Human Rights Code

Accessibility for Ontarians with Disability Act, 2005 (AODA)

Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation (IASR)



APPENDIX

Accessibility Goals

MULTI-YEAR ACCESSIBILITY PLAN		
Barrier	Details / Actions	Status
Physical	Ensure accessible parking spots are clear. Ensure walkways are accessible. Ensure powered-operated doors are functional. Ensure accessible bathrooms are functional.	Completed, Ongoing
Attitudinal	Provide training to all new hires within 6 months.	Ongoing
Information & Communication	Ensure the Accessibility Standards Policy is available. Review the Accessibility Standards Policy every 3 years. Provide refresher training.	Completed, Ongoing
Technological	Provide various ways of contact through telephone, email or in person meeting.	Completed, Ongoing
Systemic	Review annually at management team meeting. Annually provide employees the opportunity to provide feedback.	2023