

Accessibility Policy

Intent

St. Marys Golf and Country Club is committed to fostering an inclusive environment where all employees, contractors, volunteers, guests, visitors, clients, delivery and service persons including people with disabilities, can experience genuine lifetime experiences, ensuring all services, programs, and facilities allow equal access to employment, information, goods, and services. This Accessibility policy is to outline the dedication SMGCC will give in complying with the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

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:

1. "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."



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Scope

This policy applies to all employees, contractors, volunteers, guests, visitors, clients, delivery and service persons.

Statement of Commitment

St. Marys Golf and Country Club is dedicated to providing a welcoming and accessible environment, ensuring all people are treated in a way which allows them to maintain their dignity and independence. We are committed to creating equal opportunity for all individuals to experience genuine lifetime experiences with us. We will make all reasonable efforts to meet the needs of peoples 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, 2005.

Accessible Emergency Information

St. Marys Golf and Country Club is committed to providing members, clients, the public and employees with publicly available emergency information in an accessible way upon request. We will also provide individualized emergency response plans when necessary and requested. The following steps will be taken to provide and create the individualized plan:

- Providing individualized emergency response information to the employee;
- With the employee's consent, sharing this information with the person(s) who will be designated to aid them during an emergency;
- Reviewing the information contained in an employee's emergency response plan when:
 - The employee changes work locations (e.g., to a different floor or office);
 - The employee's overall accommodation needs are being reviewed; and
 - When St. Marys Golf and Country Club' general emergency response policies are being reviewed.

St. Marys Golf and Country Club will ensure that regardless of whether the disability is permanent (e.g., vision loss), or temporary (e.g., broken limb), employees are afforded the same level of accommodations required.



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The following four major elements have been considered for this Emergency Preparedness and Response Policy:

1. Prevention (use of the policies and procedures to follow to avoid or minimize any emergencies);
2. Preparation (the actions and procedures to take to ensure that St. Marys Golf and Country Club and its employees are ready to effectively respond);
3. Response (the actions to be taken in the event of an emergency); and
4. Recovery (how employees and supervisors can return to normal business operations).

Accessibility Standards

St. Marys Golf and Country Club adheres to the accessibility standards set forth in the AODA, including but not limited to:

- Information and Communications
- Employment and Training
- Customer Service
- Transportation
- Design of Public Spaces

1. Information and Communications

St. Marys Golf and Country Club is committed to meeting the communication needs of people with disabilities and will make information available in varying formats, upon request. We will consult with people with disabilities to determine their information and communication needs. We will ensure our website continues to be compliant with WCAG 2.0.

St. Marys Golf and Country Club will ensure feedback processes remain accessible to people with disabilities, upon request. We will include links on our website to inform visitors of alternative methods of communication (such as telephone number and address), in which they can provide feedback. We will continue to serve our members and potential members how they want to be served.

2. Employment and Training

St. Marys Golf and Country Club is committed to fair and accessible employment practices; welcoming and encouraging employment applications from people with disabilities. St. Marys Golf and Country Club will do its part to make hiring and employee support practices more accessible by providing accommodation during all stages of recruitment, hiring, and employment, when requested.

We will take the following steps to notify the public and employees that, when requested, St. Marys Golf and Country Club will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- Allow alternative application method(s) and include those on all job ads.
- Request 3rd party vendors to provide alternative methods for completing parts of the application process where possible.

St. Marys Golf and Country Club will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Review cases of employees who have returned to work after a long-term disability period
- Draw best practices and allow flexibility in the process to accommodate any form of disability

We will ensure the accessibility needs of employees with disabilities are taken into account when performance management and career development plans are formulated.

Training

St. Marys Golf and Country Club will provide training to all employees and other staff members (i.e. co-op students, interns), on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best relates to the duties of employees. St. Marys Golf and Country Club will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws within a reasonable amount of time after acceptance of employment offer:

- Include AODA training in our orientation sessions for every new employee.
- Train all existing employees on AODA and how it applies to their job.

The training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- St. Marys Golf and Country Club's plan related to 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.
- What to do if a person with a disability is having difficulty in accessing St. Marys Golf and Country club goods or services.
- Employees will also be trained when changes are made to the plan.



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3. Customer Service

St. Marys Golf and Country 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 dignity and independence of persons with disabilities.
- Service to people with disabilities will be integrated 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 equal opportunity 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 St. Marys Golf and Country Club. Note: This policy does not include support for those using emotional support animals, which will not be permitted indoors and/or in designated outdoor foodservice locations.

If a person with a disability is accompanied by a guide dog or other service animal, St. Marys Golf and Country 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. Refer to the SMGCC Animal Policy for further detail and limitations.

Support Workers

If a person with a disability is accompanied by a support person, St. Marys Golf and Country 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.

St. Marys Golf and Country 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.



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Service Interruptions

If there is a temporary disruption in any of our services either in whole or in part, St. Marys Golf and Country 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.

Process for Receiving Feedback

St. Marys Golf and Country 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. We are committed to responding to inquiries in a timely manner and taking appropriate actions to address concerns.

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

4. Transportation

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

5. Design of Public Spaces

If St. Marys Golf and Country 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 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, so long as the cost to do so is not overly prohibitive. St. Marys Golf and Country Club will also ensure any newly redesigned or redeveloped areas are maintained in accordance with the rules set out by the AODA, so long as the cost to do so is not overly prohibitive.



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Review and Revision

St. Marys Golf & Country Club recognizes that the landscape of accessibility is dynamic and ever-evolving. As part of our ongoing commitment to fostering an inclusive environment, we are dedicated to regularly reviewing and revising this Accessibility Policy. This process involves periodic assessments to ensure alignment with current accessibility standards, advancements in technology, and the ever-changing needs of our diverse community.

We actively seek input from members, guests, and staff, valuing their perspectives as essential contributors to our continuous improvement efforts. Through this iterative approach, we aim to identify and address emerging challenges, refine our practices, and remain at the forefront of accessibility initiatives. Our dedication to regular review and revision underscores our pledge to not only meet but exceed the expectations set by the AODA, thereby creating an environment that is welcoming and accessible to everyone.

For more information on this accessibility plan, please contact HR Generalist at:

- Phone: 519-284-3704 x #39
- Email: HR@stmarysgolf.com

Accessible formats of this document will be available for free upon request.

General Manager: Matt Staffen Signature : _____ Date: December 18, 2023