



**FRIDAY HARBOUR™**  
*All Seasons Resort*

Subject: Accessibility Policy and Multi-Year Accessibility Plan	Policy Number: 10-90-920-502
Division: General & Administration	Department: Human Resources
Category: AODA-Accessibility for Ontarians with Disabilities Act	
Date Issued: December 2023	Date Revised: January 2024
Approved: CEO & DHR	Signature:

**POLICY**

Friday Harbour strives to meet the needs of its colleagues and customers with disabilities and is working hard to remove and prevent barriers to accessibility. Friday Harbour is committed to fulfilling our requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”). Friday Harbour will establish, implement, and maintain a Multi-year Accessibility Plan, which outlines the Resort’s strategy to prevent and remove barriers and meet its requirements.

**PURPOSE**

The purpose of this Statement of Policy and Procedure is to create a workable Multi-year Accessibility Plan that outlines the Resort’s strategy to prevent and remove barriers and meet its requirements under the Integrated Regulation. This plan will meet the needs of all Homeowners, guests of the Resort, and colleagues with disabilities, and provide a mechanism for planning, reviewing, and evaluating the implementation of the AODA Accessibility Standards.

**SCOPE**

This policy applies to all colleagues, clients, and all facilities at Friday Harbour, and where indicated, to any independent contractor representatives working for the Resort.

**RESPONSIBILITY**

It is the responsibility of Friday Harbour to assess current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for persons with disabilities. Friday Harbour will address the identified barriers and develop a five-year plan for the removal and prevention of these barriers. It is the responsibility of the Friday Harbour to post the plan on the corporate website. Friday Harbour will report annually on its website on its progress in implementing this plan. It is the responsibility of Friday Harbour to provide all information relating to the plan in alternative accessible formats upon request.

It is the responsibility of the Accessibility Advisory Committee to:

- Identify and understand structures, laws, rules, policies, programs, practices, and services of, or applicable to, the Resort regarding accessibility and barriers to access that people with disabilities may encounter.
- Ensure the Resort meets its obligations under the AODA to develop a Multi-year Accessibility Plan and other requirements as required under the law.
- Develop and implement an accessibility plan that includes, among other things:
  - The identification and prioritization of barriers that need to be addressed as per established standards over the next year and subsequent years through consultation



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- with Members and colleagues; and
- An annual action plan to eliminate barriers as per established standard and priority.
- Evaluate the progress made toward achieving objectives as per AODA target dates and completion dates;
- Update the Multi-year Accessibility Plan and make it available to the general public;
- Act as the Resort's ambassador in the elimination of barriers and promotion of accessibility;
- Communicate all documents (e.g., policies, plans) to Resort colleagues and ensure they are trained on accessibility issues and the policies and plans as required by law;
- Prepare and submit the necessary reports and documentation to the Resort's Chief Executive Officer and the government;
- Examine and monitor progress to ensure the plan is being implemented accordingly and make adjustments at least four times a year.

### **Multi-year Accessibility Plan**

Friday Harbour will work to improve accessibility by following the Multi-year Accessibility Plan that conforms to the Regulation which outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA and its standards. The Multi-year Accessibility Plan sets out Friday Harbour's policy on how we will achieve accessibility generally, as well as in employment, information and communications, and the design of public spaces (built environment).

Specifically, the multi-year plan will:

- Provide a framework for developing cohesive accessibility initiatives which identify, remove and prevent barriers;
- Set annual goals for specific improvements to accessibility;
- Establish action plans for meeting those goals and initiating accountability at various levels; and
- Seek input and suggestions from the Resort community
- The plan will also be provided in alternative formats upon request.
- The multi-year plan must be reviewed and updated at a minimum of once every five years.
- The plan will be publicly posted on the Resort website.

Under the AODA, Ontario Regulation 191/11, titled, Integrated Accessibility Standards Regulation ("IASR"), the following accessibility strategies set out the requirements that are applicable to Friday Harbour:

1. Workplace Emergency Response Information;
2. Training;
3. Information and Communication;
4. Employment; and
5. Design of Public Spaces Standards.



## Section 1. Achievements to Remove and Prevent Barriers

The following sets out how Friday Harbour is committed to complying with the IASR.

### 1. Emergency Procedures, Plans, or Public Safety Information

Where Friday Harbour is aware that a colleague has a disability, and that there is a need for accommodation, individualized workplace emergency response information will be provided to the colleague as soon as practicable if such information is necessary given the nature of the colleague's disability.

- Friday Harbour will be implementing the following measures to address Emergency Response and to provide individualized workplace emergency response information to colleagues who have disclosed a disability;
- Where colleagues disclose a disability and are being accommodated according to their disabilities, workplace emergency response information forms will be prepared where required;
- Where required, Friday Harbour provides assistance to specific disabled colleagues, with the disabled colleagues' prior consent, to help them evacuate the workplace in case of an emergency or disaster. Plans for providing assistance will be set out in individualized emergency plans for the colleagues; and
- With the colleague's consent, provide the workplace emergency response information on an 'as needed' basis to the person(s) designated to provide assistance to the colleague.

On an ongoing and regular basis, and as per the applicable terms of the IASR, Friday Harbour will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

The individualized workplace emergency response information will be reviewed:

- When the colleague moves to a different location in the Resort;
- When the colleague's overall accommodation needs or plans are reviewed; and
- When the Resort reviews its general emergency response policies

Upon request, Friday Harbour will provide the information in an accessible format or with communication supports as soon as practicable. Friday Harbour will consult with the person with the disability in the case of a request for an alternative accessible format and communication supports; and will provide such information at not more than the regular cost charged to other people.

Legislated Compliance Date: January 1, 2012

### 2. Training

- Friday Harbour will ensure training is provided to all colleagues on the requirements of the Regulation and on the Human Rights Code as it pertains to persons with disabilities.
- The type and intensity of training on the requirements of accessibility standards and the Human



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Rights Code may vary according to the duties of the colleagues.

- In accordance with the IASR, Friday Harbour will:
  - determine and ensure that appropriate training on the requirements of the IASR and on the *Human Rights Code* as it pertains to persons with disabilities, is provided to all colleagues, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on Friday Harbour's behalf, and persons participating in the development and approval of Friday Harbour's policies;
  - ensure that the training is provided to persons referenced above as soon as practicable;
  - keep and maintain a record of the training provided, including the dates the training was provided and number of individuals to whom it was provided; and
  - ensure training re-occurs when there are changes to Friday Harbour's policies on an ongoing basis.

Required Legislative Compliance: January 1, 2015

### **3. Information and Communications Standard**

Commitment to Accessibility Policies, Practices and Procedures:

Friday Harbour has established an accessibility policy, procedures, and practices for providing accessible information and communications that take into account a person's disability when communicating or providing information. Friday Harbour will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities. This includes:

- Posting the policy on the Resort website;
- Providing the policy in an alternative format upon request;
- Ensuring that the cost of providing this policy in an accessible format is not more than the regular cost charged to other people; and
- Reviewing the policy at least annually or when there are changes to the law or to practices and procedures
- Notifying the public about the availability of accessible formats and communication supports;
- Consulting with a person with a disability when alternative accessible formats and communication supports are requested;
- Through its Accessibility Advisory Committee, Friday Harbour will monitor and evaluate accessibility initiatives and changes to applicable legislation and/or regulations. Changes to policies, plans and initiatives will be incorporated as required. Friday Harbour will also report on performance in relation to established accessibility goals and targets.

#### **a. Feedback**

Friday Harbour has ensured that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications support, upon request. In accordance with the IASR this includes:

- ensuring that existing and new processes for receiving and responding to feedback are



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- accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
    - provide or arrange for the provision of such accessible formats and communication supports;
    - when an accessible format is requested, the person making the request is consulted to determine suitability of format;
    - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
  - The public is notified about the availability of accessible formats and communication supports; and
  - Reviewing the policy at least annually or when there are changes to the law or to practices and procedures.

Required Legislative Compliance Date for Feedback: January 1, 2015

Required Legislative Compliance Date for Accessible formats and communication supports: January 1, 2016.

### **b. Accessible Websites and Web Content**

Friday Harbour has ensured that any and all websites and web content hosted by Friday Harbour comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and increasing to Level AA (for all websites and content). The Friday Harbour website is compliant.

This includes:

- Conducting an assessment of the Resort's website and testing for accessibility.
- Developing accessible website and web content that conforms with WCAG 2.0 level A and eventually that conforms to the WCAG 2.0 level AA; and
- Monitoring website accessibility and compliance with the guidelines and the law.

Required Legislative Compliance:

WCAG 2.0 Level A – new Internet websites and web content: January 1, 2014

WCAG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR: January 1, 2021.

### **4. Employment Standard**

Friday Harbour will include the requirements under the employment standard, including the following:



## **A) Recruitment**

Friday Harbour promotes employment opportunities for the designated groups including persons with disabilities. This includes providing accessibility at all stages of the employment cycle.

In accordance with the IASR, Friday Harbour will do the following:

### **(i) Recruitment – General**

Friday Harbour is committed to fair and accessible employment recruiting practices that attract and retain colleagues with disabilities. Friday Harbour will notify colleagues and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- specifying that accommodation is available for applicants with disabilities, on Friday Harbour's website and on job postings.

### **(ii) Recruitment, assessment and selection**

Friday Harbour will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability where a selected applicant requests accommodation.

### **(iii) Notice to Successful Applicants**

When making offers of employment, Friday Harbour will notify the successful applicant of its policies for accommodating colleagues with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of Friday Harbour's policies on accommodating colleagues with disabilities in offer of employment letters.

Required legislative compliance: January 1, 2016

## **B) Support Information for New Colleagues**

In accordance with the IASR, Friday Harbour informs colleagues of policies that support colleagues with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account a colleague's accessibility needs due to a disability, as soon as practicable after new colleagues begins employment. This will include:

- informing current colleagues and new hires of Friday Harbor's policies supporting colleagues



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with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account a colleague's needs due to disability;

- providing information as soon as practicable after the new colleague begins employment, specifically in the orientation process;
- keeping colleagues updated on changes to existing policies on job accommodations with respect to disabilities;
- where a colleague with a disability so requests it, Friday Harbour will provide or arrange for provision of suitable accessible formats and communications supports for:
  - information that is needed in order to perform the colleague's job;
  - information that is generally available to colleagues in the workplace; and
- in meeting the obligations to provide the information that is set out above, Friday Harbour will consult with the requesting colleague in determining the suitability of an accessible format or communication support.

Required legislative compliance: January 1, 2016

**C) Document Individualized Plans**

Friday Harbour will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Friday Harbour's existing policies include steps that Friday Harbour will take to accommodate colleagues with disabilities and to facilitate colleagues' return to work after absence due to disability.

Friday Harbour will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for colleagues with disabilities, if such plans are required.

In accordance with the provisions of the IASR, Friday Harbour will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the colleague requesting accommodation can participate in the development of the plan;
- information regarding the means by which the colleague is assessed on an individual basis;
- information regarding the manner in which Friday Harbour can request an evaluation by an outside medical or other expert, at Friday Harbour's expense, to assist Friday Harbour in determining if and how accommodation can be achieved;
- steps to protect the privacy of the colleague's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the colleague's accessibility needs;



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- the following will be included if individual accommodation plans are established:
  - any individualized workplace emergency response information that is required;
  - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the colleague with:
    - information that is needed in order to perform the colleague's job;
    - information that is generally available to colleagues in the workplace; and
- identify any other accommodation that is to be provided to the colleague.

Friday Harbour will ensure that the return to work process as set out in its existing policies outlines:

- the steps Friday Harbour will take to facilitate the colleague's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such colleagues; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

Required legislative compliance: January 1, 2016

**D) Performance Assessment, Career Development, Advancement**

Friday Harbour will ensure that its procedures take into account the accessibility needs of colleagues with disabilities and their individual accommodation plans:

- When assessing their performance using its performance management process;
- In managing their career development and advancement; and
- When redeploying colleagues with disabilities.

In accordance with the IASR, Friday Harbour will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- take the accessibility needs of colleagues with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance;
  - managing career development and advancement; and
  - when redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of colleagues with disabilities when providing career development and advancement to its colleague with disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of colleagues with disabilities when redeploying colleagues , including review and, as necessary, modification of colleague transfer checklist.

Required legislative compliance: January 1, 2016

**E) Accessible Formats and Communication**





Friday Harbour will, upon request by a colleague with a disability, provide accessible formats and communication support for information in the workplace in consultation with the colleagues making the request.

### **5. Design of Public Spaces**

Friday Harbour recognizes its obligations under the relevant sections of the Regulation and is committed to incorporating barrier-free design principles into any and all public spaces that are newly constructed and redeveloped on or after January 1, 2017.

Friday Harbour Resort was designed with accessibility for all Ontarians in mind. We complete accessibility audits to ensure that the accessibility standard is being upheld in all our public spaces.

### **Accessibility Standards for Customer Service**

Friday Harbour is committed to compliance with the Accessibility Standards for Customer Service Regulation (O.Reg.191/11) under the AODA, which involves providing its services in ways that respects the dignity and independence of people with disabilities.

Friday Harbour's colleagues who are involved in providing customer service to its customers and the general public have been trained on Friday Harbour's Customer Service Policy, and all new colleagues hired to provide such services will receive such training as part of their orientation with the company.

Copies of Friday Harbour's AODA Customer Service Policy are included in Friday Harbour's Employee Handbook and will be made available to members of the public and third parties on request.

## **Section 2. Strategies and Actions**

### **Emergency Procedures, Plans, or Public Safety Information**

By January 1, 2025, Friday Harbour will:

- Reassess the existing emergency response plan and procedures and any public safety information for barriers to persons with disabilities during an emergency; and
- Update its emergency procedures to ensure that they can be followed by persons with disabilities and to ensure they meet the needs of persons with disabilities.

### **Providing Information and Communications in Accessible Formats and with Communications Support**

By January 1, 2025, Friday Harbour will:

- Reassess and review the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that exist in the Resort; and
- Explain how the Resort plans to produce and deliver alternately formatted material essential to the Resort and the Residents, and what those materials are.

### **Assessment of Barriers in Employment**

Friday Harbour will identify, remove, and prevent barriers in employment by evaluating existing policies



and procedures as well as the overall workplace.

### **Design of Public Spaces**

Friday Harbour is committed to making all our public spaces free from any barriers. Friday Harbour completes accessibility audits to ensure that the accessibility standard is being upheld in all our public spaces. By January 1, 2025, we will have tactile sensors located in key areas throughout the Resort.

### **Self-service Kiosks**

At this time, Friday Harbour does not use self-service kiosks, but if Friday Harbour were to use a self-service kiosk, it will incorporate accessibility features when designing, purchasing, or obtaining these kiosks.

### **Feedback**

If individuals have questions on this policy, want to provide feedback or have a complaint, they can contact the Director of Human Resources, Victoria Gilbert at [vgilbert@fridayharbour.com](mailto:vgilbert@fridayharbour.com) or by phone at 705-812-8885.

### **DEFINITIONS**

- 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.
- Accommodation: the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.
- Communication supports: may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.
- Communications: the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.
- Design of Public Spaces Standard describes ways to make communal spaces more accessible; recreational trails and beach access routes, outdoor public eating areas like rest stops or picnic areas, outdoor play spaces, accessible parking, outdoor paths of travel.
- Dignity: service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.
- Equal opportunity: service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.
- Independence: when a person is able to do things on their own without unnecessary help or



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interference from others.

- Information: includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.
- Integration: service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals, unless an alternative measure is necessary to enable the individual to access goods or services.
- Reasonable efforts: taking approaches that meet the required needs of the individual.

**REFERENCES AND RELATED STATEMENTS OF POLICY AND PROCEDURE**

Accessibility for Ontarians with Disabilities Act, 2005

Integrated Accessibility Standards, Ontario Regulation 191/11

Policy # 10-90-920-501 Statement of organizational commitment