

**EAGLES NEST GOLF CLUB INC.
ACCESSIBILITY POLICY**

Integrated Accessibility Standards Policy

The following policy has been established by Eagles Nest Golf Club Inc. to govern the provision of services with *Regulation 191/11: Integrated Accessibility Standards* (“Regulation”) under the *Accessibility for Ontarians with Disabilities Act, 2005*.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Eagles Nest Golf Club Inc. is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) in meeting the accessibility needs of persons with disabilities.

The core values of Eagles Nest Golf Club are:

- **Guest Service**
 - Customer satisfaction is our number one priority.
- **People**
 - Our people are our most important competitive resource; ultimately, they determine our reputation and vitality.
 - We respect and value input and opinion and encourage self-improvement, innovation, creativity, and entrepreneurialism.
- **Integrity**
 - We act with honesty and professionalism, guided by the highest standards of ethical conduct. We take accountability for all of our decisions and actions.
- **Teamwork**
 - We work together to achieve our common goals. We recognize the impact of each individual’s contribution and the importance of maintaining a co-operative and supportive work environment.
 - We have the necessary tools, training, and authority to exceed expectations. We trust and support each other in making informed decisions and taking appropriate actions.

Definitions

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

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- 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 co-ordination, 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- 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 – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

Statement of Commitment

Eagles Nest Golf Club is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities, where possible.

Eagles Nest Golf Club 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

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requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws.

Accessibility Plan

Eagles Nest Golf Club maintains an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan is reviewed and updated at least once every five years and is posted on the company's website. Upon request, Eagles Nest Golf Club will provide a copy of the Accessibility Plan in an accessible format.

Training

Eagles Nest Golf Club will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Eagles Nest Golf Club policies; and,
- all other persons who provide goods, services, or facilities on behalf of the company

The training will be appropriate to the duties of the employees, volunteers, and other persons.

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- 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;
 - or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- Eagles Nest Golf Club's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

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Employees will be trained when changes are made to the accessibility policy. New employees will be trained within 30 days of commencing their duties.

Eagles Nest Golf Club will keep a record of the training it provides.

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 will ensure that our staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our services or facilities.

Communication

We will communicate with people with disabilities in ways that take into account their disability.

We will work with people with disabilities to determine what method of communication - email, phone, mail or in person, works for them.

Service Animals

A customer with a disability that is accompanied by a 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. The exclusion applies to the following food preparation areas: the Main Kitchen, Jim & Garry's Pub Kitchen and Talon Grill Kitchen.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a guide dog, service animal or service dog is prohibited by law (see applicable laws below) Eagles Nest Golf Club 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).

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Applicable Laws:

Food Safety and Quality Act 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling or storing of animals or parts of animals.

The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as Pit Bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

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, Eagles Nest Golf Club may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- 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 time.

Allergies:

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

Support Persons

If a customer with a disability is accompanied by a support person, Eagles Nest Golf Club 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.

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There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, Eagles Nest Golf Club will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Support person accompanying a person with a disability is responsible for the payment of applicable goods and services while onsite.

Notice of Temporary Disruption

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Eagles Nest Golf Club. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Eagles Nest Golf Club's goods 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.

Notifications will Include:

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

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

Notifications Options:

When disruptions occur Eagles Nest Golf Club will 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 and/or on the Eagles Nest Golf Club website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment;
or
- by any other method that may be reasonable under the circumstances.

Feedback Process

Eagles Nest Golf Club welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback forms along with alternative methods of providing feedback such as verbally (in person or by telephone) or in writing (handwritten, delivered, website or email), will be available upon request.

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Submitting Feedback:

Customers may submit **Customer Accessibility Feedback Form** to:

- Mailing Address:
Eagles Nest Golf Club
Human Resources
10,000 Dufferin Street, PO Box 403, Maple Ontario, L6A 1S3
- T: 905.417.2300
- F: 905.417.0525
- E: general@eaglesnestgolf.com

Customers can expect to hear back within five business days.

Eagles Nest Golf Club ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Notice of Availability of Documents

Eagles Nest Golf Club will notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information on the Eagles Nest Golf Club's website and/or any other reasonable method.

The Accessibility Compliance Reports are publicly available upon request; they can also be accessed through our website <https://www.eaglesnestgolf.com/privacy.htm> under *Privacy/Legal/Accessibility*.

For contact information, please see the last section of this policy “Questions About This Policy”.

This policy and its related procedures will be reviewed as required in the event of legislative changes.

Self-service Kiosks

Eagles Nest Golf Club will incorporate accessibility features when designing, procuring or acquiring self-service kiosks. We will always be aware of the accessibility features of self-service kiosks for persons with disabilities.

Information and Communications

Upon request, Eagles Nest Golf Club will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person’s accessibility needs due to disability.

Eagles Nest Golf Club will consult with the person making the request in determining the suitability of an accessible format or communication support.

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Eagles Nest Golf Club will also notify the public about the availability of accessible formats and communication supports.

Eagles Nest Golf Club will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

Employment

Recruitment

Eagles Nest Golf Club notifies employees and the public about the availability of accommodation for applicants with disabilities in our recruitment process.

Recruitment Assessment or Selection Process

Eagles Nest Golf Club notifies job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Eagles Nest Golf Club will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, Eagles Nest Golf Club notifies the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

Eagles Nest Golf Club will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information is provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Eagles Nest Golf Club will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Eagles Nest Golf Club will consult with the employee making the request.

Workplace Emergency Response Information

Eagles Nest Golf Club will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Eagles Nest Golf Club is aware of the need for accommodation due to the employee's disability. Eagles Nest Golf Club will provide this information as soon as practicable after becoming aware of the need for accommodation.

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Where the employee requires assistance, Eagles Nest Golf Club will, with the consent of the employee, provide the workplace emergency response information to the person designated by Eagles Nest Golf Club to provide assistance to the employee.

Eagles Nest Golf Club will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed.

Documented Individual Accommodation Plans

Eagles Nest Golf Club has a written process to develop individual accommodation plans for employees.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

Return to Work Process

Eagles Nest Golf Club maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodation in order to return to work.

Design of Public Spaces

Eagles Nest Golf Club will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.

Public spaces include outdoor paths of travel, like sidewalks, ramps, stairs, and curb ramps around the main clubhouse and the turf facility.

Questions About This Policy

If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by Human Resources at Eagles Nest Golf Club.

- Mailing Address:
Eagles Nest Golf Club Inc.
Human Resources
10,000 Dufferin Street, PO Box 403, Maple Ontario, L6A 1S3
- T: 905.417.2300
- F: 905.417.0525
- E: general@eaglesnestgolf.com

This policy and its related procedures will be reviewed as required in the event of legislative changes.

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