

ISSUED BY	Human Resources	APPLIES TO	Mount Pleasant Group of Cemeteries & Canadian Memorial Services
EFFECTIVE DATE	November 4, 2024	SUPERSEDES	AODA Customer Service Standard – New Integrated Accessibility Standards Regulation 2016
REVISION DATE	November 1, 2024	APPROVED BY	Anne Huizingh, Director of Human Resources
RELATED POLICIES	Accommodation Protocol; Respect in the Workplace		

Policy Statement

Mount Pleasant Group, comprised of the Mount Pleasant Group of Cemeteries and Canadian Memorial Services (collectively, “we/our”) is committed to ensuring equal access and participation for persons with disabilities. We are committed to treating persons with disabilities in a way that allows them to maintain their dignity and independence.

We seek to provide quality products and services, as well as ongoing employment opportunities, that are accessible to people of all abilities in a way that is consistent with the principles of dignity, independence, integration and equal opportunity. This means that:

- We respect dignity by ensuring that services are provided in a respectful manner consistent with the needs of the individual, treating all persons as valued and deserving of effective and full service.
- We provide services for persons with disabilities that support their independence and allow them to do things their own way, while respecting their right to safety and personal privacy.
- We use appropriate methods to accommodate persons with disabilities to enable them to access the workplace or when accessing our services as clients, enabling them to have the same or similar experience as any other individual.
- We take into account individual needs to provide equal opportunity for persons with disabilities to obtain, use and benefit from our goods and services.

We are committed to meeting the needs of persons with disabilities in a timely manner. We will do so by removing and/or preventing barriers to accessibility, addressing the needs of our patrons and employees with different disabilities, and by meeting our accessibility requirements under Ontario's accessibility laws. If a barrier to accessing our goods and services cannot be removed, we will seek alternative ways to access the goods and services.

Purpose

The [Accessibility for Ontarians with Disabilities Act, 2005](#) (the "**AODA**") is a provincial statute aimed at developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises within designated timelines.

[O. Reg. 191/11: Integrated Accessibility Standards](#) (the "**IAS**") made under the AODA, provides a compliance framework for large organizations like ours to implement accessibility standards in the following areas:

- customer service;
- information and communications;
- employment;
- transportation;¹ and
- design of public spaces.

This Accessibility Policy (the "**Policy**") and the following practices are intended to meet the requirements of the AODA. This Policy operates in conjunction with other policies regarding non-discrimination and our obligations under [The Ontario Human Rights Code](#) (the "**Code**"), as well as our policies regarding obligations under the [Ontario Occupational Health and Safety Act, R.S.O. 1990](#)

¹ This standard applies only where a fare is charged, and therefore is not relevant to MPG.

Scope

This Policy applies to the delivery of all goods and services by MPG. This Policy also applies to all of our employees who work in Ontario.

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.

Assistive device includes any tool, technology, or other mechanism that helps a person with a disability do everyday tasks such as moving, communicating, or lifting. Assistive devices include both mobility assistive devices (such as canes, walkers or similar aids), and medical aids (such as respirators and portable oxygen supplies). Additional examples include but are not limited to wheelchairs, lifts, reading machines, recording machines, amplifiers, TTY services, and communication boards.

Barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of a disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

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.

Disability as defined in AODA and the Ontario Human Rights Code (the “Code”) means:

- 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 a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; and/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.

Service animal means an animal providing assistance for a person with a disability if:

- the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal. This includes a guide dog as defined in section 1 of the [*Blind Persons' Rights Act, R.S.O. 1990*](#); or
- the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability and is a member of:
 - the College of Audiologists and Speech-Language Pathologists of Ontario;
 - the College of Chiropractors of Ontario;
 - the College of Nurses of Ontario;
 - the College of Occupational Therapists of Ontario;
 - the College of Optometrists of Ontario;
 - the College of Physicians and Surgeons of Ontario;
 - the College of Physiotherapists of Ontario;
 - the College of Psychologists of Ontario; or
 - the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario,

Support person means any person who accompanies a person with a disability to assist with communication, mobility, personal care, medical needs, or access to goods and services.

Integrated Accessibility Standards

We are committed to excellence in serving the needs of all customers and employees, including those with disabilities. Every effort will be made to ensure we carry out our duties in the following areas:

Information and Communication Standards

Feedback:

We welcome comments and feedback on the way we provide our products and services to all customers, including those with disabilities. Such feedback can be made in a variety of ways including in person, by telephone, in writing, by email, or online. We are committed to ensuring that our feedback process is accessible by providing or arranging accessible formats and communication support upon request. Where contact is requested, we will respond to such feedback within 3 business days. The feedback we receive will be used to improve the way we provide our products and services to all customers.

Accessible Formats, Communication Supports and Emergency Procedures:

Upon request for accessible formats and communication supports for any information we directly control and provide, including, but not limited to, emergency procedures, plans or other public safety information, we will consult with the person making the request before providing information in a timely way that takes into account that person's accessibility needs due to disability. We provide such information at no additional cost to the person making the request. We also notify the public of the availability of these accessible formats and communication supports on our website and via on-site signage. If we cannot provide accessible formats, we will provide the requesting person with an explanation as to why that is so and a summary of the unconvertible information or communication in either standard or accessible format (whichever preferred).

We are committed to providing fully accessible telephone service to our customers. We do so using the Bell Relay Service (BRS) available at: **1 800 855-0511** (Voice to TTY) **711** (TTY to Voice) **1 800 855-1155** (TTY to TTY) For Operator Assistance in billing long distance call to another TTY.

All employees who may be required to provide telephone service to our customers in the course of their duties are required to review the attached [Bell Relay Service \(BRS\) document](#) (*employee access*) for usage instructions. We will communicate with persons with disabilities in whatever ways are required to enable successful communication that takes into consideration their disability. We will offer to

communicate with customers by email if telephone communication is not suitable for their communication needs or is not available.

Website Content:

Our website is AODA compliant. All internet websites or web-based applications that we control directly or through a contractual relationship that allows for modification of a product conforms to the Web Content Accessibility Guidelines (WCAG) Level AA². MPG will review its website annually for compliance.

Employment Standards

Recruitment:

On our website, we notify applicants and the public about the availability of accommodation for applicants with disabilities in our recruitment processes. We also notify job applicants of these supports when they move forward in an assessment or selection process or when we make an offer of employment. We consult with the applicants and provide or arrange for suitable accommodation.

Information for Employees:

We also inform our employees of existing policies to support them as soon as practicable after they begin their employment through:

- this Policy;
- the Accommodation Protocol;
- the Respect in the Workplace Policy; and
- other means as applicable from time to time.

Employees can find these policies, as updated from time to time, on [the Hub](#) (Intranet). We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account their accessibility needs due to disability.

² This criteria does not apply to live captions, pre-recorded audio descriptions, unconvertible information or communications, information not directly or indirectly in our control, or web content published before 2012.

We also provide accessible formats and communication supports for our employees by consulting with the person making the request and addressing individualized needs. To request accessible formats and communication supports for any information required to perform an employee's job, please contact the Employee & Labour Relations Specialist (Human Resources Department).

Accommodation Plans:

We encourage our employees to participate in the development of their individual accommodation plans, if any. An employee with a disability who requires an accommodation plan should initiate this process by contacting their Manager or the Employee Benefits & Wellness Specialist (Human Resources Department). They will then work with the employee as per the process outlined in the Accommodation Protocol. All information disclosed in this process is strictly confidential and will be disclosed only to those with a need to know (e.g. your manager who may need information about the nature of your workplace accommodation).

We will work with employees to review individual plans as often as needed, developing accommodation plans that include:

- any information regarding accessible formats and communications supports provided, if requested;
- individualized workplace emergency response information, if any; and
- any other accommodation necessary.

As part of the accommodation plan, the return-to-work process can also be found in the [Accommodation Protocol](#) (*employees only*).

Workplace Emergency Response:

We provide timely individualized workplace emergency response plan information to employees who advise us of their need for accommodation. With an employee's consent, we will share this information with the person we designate to assist the employee. We review this information whenever the employee moves location, advises us of changing accommodation needs or whenever we review our general emergency policies.

Performance Management and Career Development:

Our performance management, career development and redeployment processes consider the accessibility needs of all employees.

Design of Public Spaces:

We ensure that the design and layout of our premises are accessible to persons with disabilities.³ The MPG Board of Directors has approved the use of the Rick Hansen Foundation Accessibility Certification (RFHAC) for accessibility. For any public spaces that were newly constructed or redeveloped on and after January 1, 2017, we will ensure that AODA and IAS accessibility requirements are incorporated into the planning, design, and construction phases. For any public spaces that were newly constructed or redeveloped on or after June 1, 2024, MPG will apply the principles of the RHFAC and seek certification under the RHFAC program.

Customer Service Standards

We strive to provide goods, services and facilities to all customers, including persons with disabilities, in a manner consistent with the principles of access, independence, integration, equal opportunity, and dignity.

This Policy outlines our commitment to accessible customer service and is available to any person at any time upon request or via the [MPG website](#).⁴ All documents relating to accessible customer service will be made available, upon request, in a format that takes into account the customer's disability needs. Customers may provide feedback to us as outlined in the Information and Communication Standards section above.

Use of Assistive Devices

We are committed to serving persons with disabilities who use assistive devices to obtain, use, or benefit from our products and services. If an assistive device may pose

³ These apply to access routes, ramps, slopes, outdoor public use eating areas, outdoor sidewalks or walkways, staircases, curbs, pedestrian control signals if any, rest areas, parking and applicable signage.

⁴ Employees may access this Policy on the I Drive, MPG intranet (when available), and Customers can also request a copy via the MPG website.

a risk to the health and safety of the customer or to others on the premises, we will strive to identify an option acceptable to the customer.

We will ensure that our employees are trained and familiar with various assistive devices that may be used by persons with disabilities when visiting our facilities.

Service Animals

We acknowledge the vital relationship between a person with a disability and their service animal. Service animals may accompany persons with disabilities on all parts of our premises that are open to the public. The person accompanied by the service animal will keep the animal with them at all times and will be responsible for the service animal's care, supervision, and control while on our premises.

Where another person's health and safety could be adversely affected by the presence of the service animal, we will consult with the person with the disability and with the adversely affected person to find a solution that meets the needs of both individuals.

We will ensure that all staff dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

Support Persons

We welcome persons with disabilities who are accompanied by a support person and will not prevent them from having access to their support person while on our premises. If we need to discuss confidential information with a person accompanied by a support person, the person with the disability will be asked if they wish the support person to be present.

Notice of Temporary Disruptions

We will notify customers if there is a planned or unexpected disruption of a facility or service usually used by persons with a disability. The notice will be posted at the entrance of the applicable premises, on our website, and at the office. The notice will include the following information:

- That a facility or service is unavailable.
- The anticipated duration of the disruption.
- The reason for the disruption.

- Alternative facilities or services, if available.

Training

To ensure awareness and compliance with our AODA obligations, all MPG employees and all those who are involved in the development and approvals of customer service policies, practices and procedures are required to review and abide by this Policy.

In addition, we provide training on this Policy to all employees, interns, co-op students, and persons who participate in policy development under the AODA and IAS and the Code as they pertain to persons with disabilities. Specifically, training involves:

- a review of the purpose of the AODA and the requirements of the IAS;
- a review of this Policy, including accessible customer service requirements;
- how to interact and communicate with people with various types of disabilities in a manner that is respectful of a customer's dignity and independence;
- how to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person, including how to interact with customers over the telephone;
- how to use personal assistive devices on premises to help with the provision of goods or services to people with disabilities;
- what to do if a person with a disability is having difficulty in accessing our services or facilities;
- the requirements of the Code as it pertains to persons with disabilities; and
- any of our related practices and procedures.

We ensure that training is provided as soon as is practicable and that it is appropriate to the duties of the relevant employees, directors, and other persons. We ensure that training is ongoing when changes are made to these policies, practices, and procedures, as soon as practical.

We maintain records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided in accordance with the requirements of AODA.

Accessibility Plans & Reports

We will maintain and make public our Multi-Year Accessibility Plan (the “**Plan**”) to improve the accessibility of our services and premises and meet the compliance requirements of the AODA. The Plan will be updated at least once every five (5) years and is available on our website.

We will prepare and file accessibility reports with the Ministry of Seniors and Accessibility or its successor(s) as required by the AODA.

Availability of Documents

All documents required by the AODA, including our Policy, notice of planned temporary disruptions, training records, and the written feedback process are available upon request from our staff at all locations and in accessible formats, subject to all applicable laws.

Modifications

Changes will not be made to this Policy unless the impact of the changes on persons with disabilities has been considered. We regularly review our organizational policies and practices to revise any that are inconsistent with the spirit and purpose of this Policy. We have reviewed our current policies and practices and are satisfied that no such modification is required at the present time.

We review and update this Policy as needed, and at least every five (5) years.

For more information, or to provide feedback with respect to our Policy, please contact Tom Sansom, CHRL – Employee & Labour Relations Specialist (Human Resources Department) at:

- **Phone:** 416-696-0049 Ext. 6501
- **Fax:** 416-696-9325
- **Email:** tsansom@mountpleasantgroup.com
- **Mail:** 500 – 65 Overlea Boulevard
Toronto, ON M4H 1P1