

<b>ISSUED BY</b>	Human Resources	<b>APPLIES TO</b>	Mount Pleasant Group of Cemeteries & Canadian Memorial Services
<b>EFFECTIVE DATE</b>	November 4, 2024	<b>SUPERSEDES</b>	AODA Accessibility Commitment and Multi-Year Plan
<b>REVISION DATE</b>	November 1, 2024	<b>APPROVED BY</b>	Anne Huizingh, Director of Human Resources
<b>RELATED POLICIES</b>	Accommodation Protocol; Accessibility Policy		

## Introduction and Overview

The Mount Pleasant Group, comprised of the Mount Pleasant Group of Cemeteries and Canadian Memorial Services (collectively, MPG or “**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 that are accessible to people of all abilities and to always uphold the principles of dignity, independence, integration and equal opportunity.

The [Accessibility for Ontarians with Disabilities Act, 2005](#) (the “**AODA**”) and applicable regulation, [O. Reg. 191/11: Integrated Accessibility Standards](#) (the “**IAS**”), were enacted in Ontario to develop specific standards of accessibility for Ontarians and to enforce them with respect to:

- Information and communication;
- Employment;
- Transportation (not applicable to MPG);
- Design of public spaces; and
- Customer service

The purpose of the AODA is to benefit all Ontarians by:

- 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 on or before January 1, 2025; and
- Providing for the involvement of persons with disabilities, the Government of Ontario and of representatives of industries and various sectors of the economy in the development of accessibility standards.

Under the AODA and the IAS, we are required to establish, implement, maintain and document the Plan, which outlines our strategy to identify, prevent and remove accessibility barriers and meet our requirements under the law.

## Who Are People with Disabilities?

When we think of disabilities, we tend to think of those that are visible and obvious, but disabilities can also be invisible. The AODA uses the same definition of “**disability**” as the Ontario *Human Rights Code* (the “**Code**”), being:

- 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.

## **What are Barriers?**

It is important to be aware of both visible and invisible barriers. A barrier is anything that keeps a person with a disability from fully participating in all aspects of society because of their disability.

- **Attitudinal** barriers may result from assumptions we make or the way we think or behave.
- **Architectural or structural** barriers may result from design elements of a building such as stairs, doorways, the width of hallways and even room layout.
- **Information and communication** barriers can make it difficult for people to receive or convey information. For example, small print size, low colour contrast between text and background, or unclear language can all cause difficulty.
- **Technology**, or lack of it, can prevent people from accessing information. Everyday tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.
- **Systemic** barriers can result from an organization's policies, practices and procedures if they restrict persons with disabilities, even unintentionally.

## **Purpose and Commitment**

We will make every effort to ensure that our guidelines, practices, and procedures adhere to the guiding principles established in the AODA. We are committed to providing quality products and services that are accessible to all, fostering an inclusive and respectful environment for all people. We are creating a workplace where people with disabilities are welcomed and valued.

The purpose of this multi-year accessibility plan (the "**Plan**") is to address issues related to the identification, removal and prevention of barriers faced by both staff and visitors with varying disabilities as required by *Accessibility for Ontarians with Disabilities Act, 2005* (AODA).

In accordance with the requirements set out in the IAS, we will:

- Post this Plan on our website;
- Provide the Plan in an accessible format upon request; and
- Review and update the Plan at least once every five (5) years.

## **Integrated Accessibility Standards**

### **General Standards**

#### ***Accessibility Policy***

We are committed to maintaining an accessibility policy that includes our statement of commitment and lays out requirements for employees at all levels in order to meet the accessibility requirements for those with disabilities.

- Achievements:
  - Our accessibility policy was last reviewed and updated on November 1, 2024, and is in compliance with the AODA;
  - Our accessibility policy is available on our website
- Goals:
  - Review and update the accessibility policy on an ongoing basis and at least every five (5) years;
  - Continue to make the accessibility policy available to employees and the public in accessible formats

### ***Multi-Year Accessibility Plan***

We are committed to developing and implementing this Plan to meet the needs of people with disabilities and the requirements of the AODA.

- Achievements:
  - Our Plan was last updated on November 1, 2024
  - Our Accessibility Compliance Report was last filed with the Government of Ontario in December 2023 as required
- Goals:
  - Post MPG's updated Multi-Year Plan on MPG website by November 11, 2024
  - Provide our Plan in accessible formats upon request
  - Review and update our Plan every five (5) years or less based on any changes to the AODA and feedback – next review required in 2029.
  - Complete and file our next Accessibility Compliance Report as required under the AODA by November 7, 2024

### ***Training***

We are committed to providing AODA training to all employees, volunteers and third parties, including anyone participating in the development and approval of the WSIB's policies.

- Achievements:
  - Our AODA training has been fully reviewed and updated as of October 15, 2024
  - Mandatory AODA training has been added to the onboarding process for all new employees
  - Two members of our Development department (Senior Leadership and Staff) have received the Rick Hansen Foundation Accessibility Certification (RHFAC)
- Goals:
  - Existing employees, managers, and Board Members will complete AODA refresher training by January 3, 2025, with updated and new content
  - We will institute a new 5 year refresher training cycle for employees and Board members to ensure knowledge updates are communicated – next cycle 2029
  - We will complete organization-wide compliance check semi-annually, beginning November 2025
  - Two additional Development department staff members to be trained as RHFAC professionals by March 31, 2025

### **Information and Communication Standards**

#### ***Feedback, Accessible Formats and Communication Supports***

We are committed to providing information and communications in a form which is accessible to all persons including those with disabilities.

- Achievements:
  - We maintain an accessible feedback process on our website, allowing feedback to be submitted in person, by phone, email or online client complaint registration
  - We arrange for the provision of accessible formats and communication supports for persons with disabilities
  - Mandatory AODA training has been added to the onboarding process for new employees
  - We have embed offers for accessible formats in our emails on October 8, 2024

- Goals:

- We will train our employees on how to provide documents with accessibility features by November 8, 2024
- We will continue to revise our information processes through feedback received
- We will design all future digital services with the AODA in mind

### **Emergency Procedures**

We endeavor to maintain a safe workplace for our employees and visitors to our properties. We do, in part, so by ensuring that emergency information is available in accessible formats.

- Achievements:

- We provide emergency information to our employees in accessible formats upon request

- Goals:

- If emergency procedures are made public, they will be provided in accessible formats upon request.

### **Website Content**

We are committed to maintaining accessible external-facing web content.

- Achievements

- MPG's website achieved AODA compliance, and was confirmed on February 15, 2023
- MPG's website remains in compliance (96% accessibility rating) as of September 26, 2024

- Goals:

- We will continue to make accessibility updates and improvements to our web content – review and subsequent updates will be done quarterly

### **Employment Standards**

#### **Recruitment**

We are committed to inclusive recruitment practices that foster a strong and diverse workforce. We do so by removing barriers to recruitment that attract talented employees.

- Achievements

- We include the following notice on all job applications about the availability of accommodations for applicants with disabilities: *The Mount Pleasant Group is committed to providing equitable opportunities to all applicants and welcomes applications from all qualified persons. We will provide accommodation in recruitment as needed. If you require an accommodation, please notify us and we will work with you to meet your needs.*
- We notify all applicants who are selected to advance through the recruitment process about available accommodations
- We notify all prospective employees about accommodations being available, if required, when we make employment offers

- Goals:

- All open external positions are posted on the Ontario Disabilities Employment Network (ODEN) job board by April 30, 2025.
- We will ensure our online job application form is AODA compliant by November 30, 2024

### **Information for Employees**

We are committed to retaining our talented workforce by providing appropriate supports and accommodations where necessary.

- Achievements:
  - We review ergonomic supports for our employee workstations upon request. If the request is reasonable and/or substantiated, MPG will provide the necessary ergonomic items
  - Many employee online training is in print and videos that include both audio and closed-captioning
- Goals:
  - We will ensure ALL online training modules are provided in print and videos that include audio and closed-captioning, as well as having full transcripts available, by December 31, 2025
  - Continue to provide accessibility supports for our employees

### ***Workplace Emergency Response***

We encourage all employees who require an individualized emergency response plan to alert management or Human Resources to their needs so that we can work together to create the necessary plan.

- Achievements:
  - We provide individualized emergency response plans (accommodations) that are confidential and disclosed only with employee consent on a need-to-know basis
  - We conducted an organization-wide self-report survey of existing employees to capture any new or required changes to existing individual emergency responses (accommodations required) via Memo on July 31, 2024
- Goals:
  - Review and revise existing plans as often as required under the AODA

### ***Accommodation and Return to Work***

We are committed to fair and accessible employment practices. We provide accommodations that take into account individual accessibility needs.

- Achievements:
  - Our accommodation protocol was reviewed and updated November 1, 2024
  - We provide accommodation and return to work processes for employees with disabilities
- Goals:
  - Continue to update our policies as needed

### ***Performance Management and Career Development***

We are committed to guiding our employees' development fairly and by taking into account the needs of employees with disabilities.

- Achievements:
  - We provide accommodation to employees with disabilities throughout all stages of employment
- Goals:
  - Continue to update our policies as needed

## **Design of Public Spaces**

We are committed to providing facilities which are accessible to persons with disabilities. We will ensure all newly constructed facilities and existing facilities which undergo major renovation will be designed to meet requirements under the AODA and the [Ontario Building Code Act](#) (the "Building Code") and to exceed those requirements wherever feasible.

- **Achievements:**
  - We have met the AODA's technical requirements for roadways, sidewalks and waiting areas.
  - We have met the AODA's requirements for all new or renovated service counters since legislation took effect
  - We have adopted the Rick Hansen Foundation Accessibility Certification standards for new builds.
- **Goals:**
  - MPG's procedures for preventative and emergency maintenance of accessible elements, along with communication requirements, are to be updated and then communicated to employees and managers by November 30, 2024
  - Continue to ensure that any new developments on MPG properties meet AODA and the Building Code requirements, at a minimum
  - Pursue RHFAC ratings for all new developments and investigate retrofit opportunities for existing facilities
  - New exterior paths of travel and recreational trails shall be designed to meet AODA standards and when existing exterior paths of travel or recreational trails require replacement or significant alteration MPG will strive for accessibility best practices.

## **Customer Service**

We are committed to serve customers of all abilities with excellence.

- **Achievements:**
  - We have trained our employees on providing accessible customer service, including interacting with persons with disabilities and working with service animals, assistive devices and support persons
  - We keep records of all employee training
  - We welcome support persons and service animals on our premises
- **Goals:**
  - Customer Service refresher training will be released for all existing employees and completed by January 3, 2025 (new employees will receive during onboarding)
  - We will continue to revise our customer service based on feedback received
  - We will review emergency procedures annually to ensure all customers are assisted in an emergency
  - MPG's procedures for preventative and emergency maintenance of accessible elements, along with communication requirements, are to be updated and then communicated to employees and managers by November 30, 2024

## **Measuring Progress**

We will continually monitor and update our progress with respect to this Plan by:

- Comparing our action plan goals against real-time results;
- Reviewing customer feedback on this Plan and our customer service and making necessary adjustments; and

**PROTOCOL TITLE:** Multi-Year Accessibility Plan  
2024-2029  
**EFFECTIVE DATE:** November 4, 2024  
**LAST REVIEW DATE:** November 1, 2024



- Reviewing and revising this Plan as needed and at least every five (5) years.

We welcome customer feedback about our Plan and our efforts to meet AODA and IAS requirements. For comments about this Plan, or to request accessible formats, please contact us at:

- Mail:  
Mount Pleasant Group  
C/O Employee & Labour Relations Specialist  
500 – 65 Overlea Boulevard  
Toronto, ON M4H 1P1
- Phone:  
(416) 696-0049 ext. 6501
- Fax:  
(416) 696-9325