

# **Trigon Construction Management Ltd. Accessibility Policy**

## **MULTI-YEAR ACCESSIBILITY PLAN**

### **Introduction**

Trigon Construction Management Ltd.'s Multi-Year Accessibility Plan ("Accessibility Plan") outlines strategies and actions that will identify, remove, and prevent barriers for people with disabilities and meet the Company's obligations under the Integrated Accessibility Standards Regulation ("IASR") pursuant to the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA"). This Multi-Year Accessibility Plan will be posted on Trigon's website and will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

This policy is intended to meet the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005 and applies to the provision of goods and services to the public or other third parties, not to the goods themselves. All goods and services provided by Trigon Construction Management Inc. shall follow the principles of dignity, independence, integration and equal opportunity.

### **Statement of Commitment**

Trigon Construction Management Ltd. is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws. Trigon Construction Management is committed to providing a barrier-free environment for all stakeholders, including our clients, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act, 2005, and its associated regulations.

Trigon Construction Management understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner. Providing an accessible and barrier-free environment is a shared effort, and we are committed as an organization to working with the necessary parties to make accessibility for a reality for everyone.

Trigon Construction Management Ltd. is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Trigon Construction Management Ltd. understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Trigon Construction Management Ltd. is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

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## Scope

This Accessibility Plan applies to all staff, including but not limited to employees, students, contractors and all other third parties involved in the operations of Trigon Construction.

- i.)** This policy applies to the provision of goods and services at the premises owned and operated by Trigon Construction Management Inc.
  - ii.)** This policy applies to employees, agents, who deal with the public or other third parties that act on behalf of Trigon Construction Ltd., including when the provision of goods or services occurs off the premises of Trigon Construction Ltd. such as in: a construction project, project meeting, business meeting.
  - iii.)** This policy does not apply to active construction projects, however measures will be considered to accommodate those with disabilities as required.
  - iv.)** The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by Trigon Construction Management Ltd.
  - v.)** This policy shall also apply to all persons who participate in the development of the Trigon Construction Management Ltd. policies, practices and procedures governing the provision of goods and services to members of the public or third parties.
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**In accordance with IASR and Ontario Regulation 429/07, this policy outlines Trigon's strategies to achieve accessibility:**

- i. Training **(Page 3)**
- ii. Communication **(Page 4)**
- iii. The Use of Assistive Devices **(Page 4)**
- iv. The Use of Guide Dogs, Service Animals and Service Dogs **(Page 5)**
- v. The Use of Support Persons **(Page 6)**
- vi. Notice of Temporary Disruptions **(Page 6)**
- vii. Feedback Process **(Page 6)**
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## **i.) Training**

We are committed to training all staff and volunteers in accessible customer service, Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train all persons who participate in developing the organization's policies; and all other persons who provide goods, services or facilities on behalf of the organization. Training of our employees and volunteers on accessibility relates to their specific roles. Training includes:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards.
- Our policies related to the 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.
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

## ii.) Communication

We communicate with people with disabilities in ways that take into account their person needs. We will work with the person with disabilities to determine what method of communication works for them. Options include:

**MAIL:** 35 Ridgeway Cir, Woodstock, ON N4V 1C9

**PHONE:** (519) 602-2222

**FAX:** 519-602-6666

**EMAIL:** [info@trigoncanada.ca](mailto:info@trigoncanada.ca)

## iii.) The Use of 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 ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

Those having any physical limitations will be accommodated by: Providing the service or goods in another manner or at another location, taking pictures or video and sharing, or by bringing the goods or service directly to the individual.

#### **iv.) The Use of Guide Dogs, Service Animals and Service Dogs**

Individuals accompanied by a guide dog or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. 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 Ontario; or a certificate of training from a recognized guide dog or service animal training school.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. An individual that is accompanied by a guide dog, service dog or service animal is responsible for maintaining care and control of the animal at all times.

Exclusion Guidelines: If a guide dog, service animal or service dog is excluded by law, Trigon Construction Management Ltd. will offer alternative methods to enable the person with a disability to access goods and services, whenever possible.

## **v.) The Use of Support Persons**

In certain cases, Trigon Construction Management Ltd. may require a person with a disability to be accompanied by a support person. Before making a decision, Trigon Construction Management Ltd. will:

- Consult with the person with a disability to understand their needs.
- Consider health or safety reasons based on available evidence.
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

If a guest with a disability is accompanied by a support person, Trigon Construction Management Ltd. will ensure that both persons are allowed to enter the premises together and that the guest is not prevented from having access to the support person. In situations where confidential information might be discussed, consent will be obtained from the guest, prior to any conversation where confidential information might be discussed.

## **vi.) Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

When disruptions occur, Trigon Construction Management Ltd. will provide notice by:

- Posting notices within visible locations including at the point of disruption, at the main entrance and at the nearest accessible entrance to the service disruption and/or on the website.
- Contacting clients, business personnel with appointments.
- Verbally notifying individuals when they contact our office.
- By applying other methods that may be reasonable under the circumstances.

## vii.) Feedback Process

Trigon Construction welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns. Feedback forms along with alternate methods of providing feedback such as, verbally (in person or by telephone) or written (hand written, deliver, website or email), will be available upon request.

Feedback may be submitted using any of the following methods:

**MAIL:** 35 Ridgeway Cir, Woodstock, ON N4V 1C9

**PHONE:** (519) 602-2222

**FAX:** 519-602-6666

**EMAIL:** [info@trigoncanada.ca](mailto:info@trigoncanada.ca)

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request. We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports in a timely manner, taking into account the person's accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication support. If Trigon determines that information or communications are unconvertible, we will provide the requestor with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications. We notify the public about the availability of accessible formats and communication supports within this document, and on our public website.

All feedback, including complaints, will be handled with compassion and respect. Trigon Construction Management will ensure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Individuals who provide formal feedback will receive acknowledgement of their feedback within 14 business days.

## **viii.) Notice of Availability of Documents**

Trigon Construction Management notifies the public that documents related to accessible customer service, are available upon request by posting a notice on our website and will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

## **ix.) Employment**

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation. We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment and staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for information that is needed in order to perform the employee's job; and information that is generally available to employees in the workplace.

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency. We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability. We will review the individualized workplace emergency response information:

- When the employee moves to a different location in the organization;
- When the employee's overall accommodations needs or plans are reviewed; and
- When the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees and for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

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



## x.) Changes to Existing Policies

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

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

## xi.) Questions and Comments

If you have any questions or concerns about this policy or its related procedures please contact Trigon Construction Management at:

**MAIL:** 35 Ridgeway Cir, Woodstock, ON N4V 1C9

**PHONE:** (519) 602-2222

**FAX:** 519-602-6666

**EMAIL:** info@trigoncanada.ca

## xii.) 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 guests 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.
- **Barrier:** the term barrier as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, procedure, or a practice. (\*\*Please note, Trigon Construction Management Ltd. manages jobsites that will have barriers present.) Those having any physical limitations will be accommodated by being provided service in another manner or at another location, or by picture or video sharing for information transfer.
- **Disability:** the term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to: 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, paralysis, and amputation.

- i. 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;
  - ii. A condition of mental impairment or a developmental disability;
  - iii. A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
  - iv. A mental disorder; or
  - v. An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
- **Guest:** is used throughout this policy and means; employee, visitor, contractor, client, delivery person, or other business personnel.
- **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:
  - i. It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
  - ii. 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.

## References:

- Accessibility for Ontarians with Disabilities Act, 2005.
- Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- Blind Person's Rights Act, 1990.
- Dog Owners' Liability Act, Ontario.
- Health Protection and Promotion Act, Ontario Regulation 562.
- Ontario Human Rights Code, 1990.