

Accessibility for Ontarians with Disabilities Act Policy

Customer Service Standard

Introduction

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was passed by the Ontario legislature with the goal of creating a fully accessible Ontario by 2025.

AODA Section 1:

“Recognizing the history of discrimination against persons with disabilities in Ontario, the purpose of this Act is to benefit all Ontarians by,

(a) 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

(b) providing for the involvement of persons with disabilities, of the Government of Ontario and of representatives of industries and of various sectors of the economy in the development of the accessibility standards.”

One of the five standards developed, and now law, is the Customer Service Standard. This standard details specific requirements for all organizations with one or more employees. Under the Customer Service Standard, all applicable employees, volunteers, board members, contractors and family members, must be trained on the following areas:

1. Establish policies, practices and procedures on providing goods, services or facilities to people with disabilities.
2. Use reasonable efforts to ensure that your policies, practices and procedures are consistent with the core principles of independence, dignity, integration and equality of opportunity.
3. Set a policy on allowing people to use their own, personal assistive devices to access your goods and use your services and about any other measures your organization offers (assistive devices, services, or methods) to enable them to access your goods and use your services.
4. Communicate with a person with a disability in a manner that takes into account his or her disability.
5. Allow people with disabilities to be accompanied by their guide dog or service animal in those areas of the premises you own or operate that are open to the public, unless the animal is excluded by another law. If a service animal is excluded by law, use other measures to provide services to the person with a disability.
6. Permit people with disabilities who use a support person to bring that person with them while accessing goods or services in premises open to the public or third parties.
7. Where admission fees are charged, provide notice ahead of time on what admission, if any, would be charged for a support person of a person with a disability.
8. Provide notice when facilities or services that people with disabilities rely on to access or use your goods or services are temporarily disrupted.
9. Train all staff, volunteers, contractors and any other people who interact with the public or other third parties on your behalf on a number of topics as outlined in the Customer Service Standard.
10. Train all staff, volunteers, contractors and any other people who are involved in developing your policies, practices and procedures on the provision of goods or services on a number of topics as outlined in the customer service standard.
11. Establish a process for people to provide feedback on how you provide goods or services to people with disabilities and how you will respond to any feedback and take action on any complaints. Make the information about your feedback process readily available to the public.

Primo Foods Inc. is committed to excellence in serving all customers including persons with disabilities.

Assistive Devices

Assistive technology is a term used to describe the various forms of devices such as assistive, adaptive, and rehabilitative devices used to assist persons with disabilities. These devices are used to support the needs of the individual person and specific disability by enabling them to perform tasks that they may not have been able to accomplish formerly.

Examples of assistive devices include hearing aids, speech amplification devices, white canes, wheelchairs, screen readers, etc. Ontario Employers are not responsible for providing any assistive devices under the Customer Service Standard, but rather, are responsible for ensuring all employees are properly trained.

Primo Foods Inc. will ensure that our staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our good and services.

Communication

Accessible customer service requires employees to overcome and find ways around different barriers that customers may have. Employers need to ensure that their employees are trained on how to successfully communicate with customers with disabilities to ensure accessible goods and services.

Primo Foods Inc. employees will communicate with people with disabilities in ways that take into account their disabilities.

Service Animals

With certain types of disabilities, an animal may be more of an assistive form of aid rather than a device. These services animals are trained to carry out certain tasks that help people with disabilities. There are three types of assistive animals that have been categorized by the international assistance animal community:

1. Guide Animals: Used to guide the blind
2. Hearing Animals: Used to help signal the hearing impaired
3. Service Animals: Used to do work for persons with disabilities other than blindness or deafness

Under the Customer Service Standard, service animals must be allowed on parts of the workplace premises (excluding certain areas such as a kitchen). Fines for denying a service animal access in areas for the general public can be up to \$3000 in Ontario.

Primo Foods Inc. will welcome people with disabilities and their service animals into parts of our workplace that are open to the public (service animals are not permitted in our production/manufacturing areas [*Safe Food for Canadians Regulations SOR/2018-108, s.51(2)* and *Ontario Regulation 493/17, s.14*] when 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 regulated health care professional, confirming the need for a service animal for reasons relating to a disability.

Support Persons

Support persons are those that help persons with disabilities perform day to day tasks. Without support, the person may not be able to access your organization. All support persons should be welcomed into the workplace.

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

Primo Foods Inc. may require a person with a disability to be accompanied by a support person when on premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises. We will consult with the person with a disability to understand their needs.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Primo Foods Inc. will notify customers promptly. A clearly posted notice will include information about the reasons for the disruption, its anticipated length of time and a description of alternative facilities or services, if available. The notice will be posted at the point of service or facility disruption.

Training

Under the Customer Service Standard all employees must be trained. Primo Foods Inc. will provide training to all employees, volunteers and others who deal with the public or other third parties on our behalf.

Our training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005
- The requirements for the Customer Service Standard
- How to interact with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device
- How to interact with people who use the assistance of a service animal
- How to interact with people who use a support person
- How to use any equipment or devices available at your workplace to assist with providing goods or services to persons with disabilities
- What to do if a person with a disability is having difficulty accessing our organization's goods or services

New employees will be trained after being hired, within two (2) weeks, and retrained in the event that changes are made to the policy.

Availability of Documents

Primo Foods Inc. will post a notice on its website and at reception to inform the public of their right to obtain copies of this Policy and Plan. If a customer with a disability requests a copy, it will be provided in a format that takes into account the person's disability.

Feedback Process

A process must be established for receiving feedback on how companies will provide service to customers with disabilities, and how companies will respond back and take action on any complaints.

Primo Foods Inc. customers who wish to provide feedback on the way we provide goods, services or facilities to people with disabilities can provide feedback via email, sbattaglia@primofoods.ca, phone 1-800-377-6945 ext. 314 or mail at 56 Huxley Rd., Toronto, Ontario, M9M 1H2

All feedback, including complaints, will be handled by Human Resources and you can expect to hear back within ten (10) business days in the manner within which the feedback was originally communicated.

If you require accessible formats or communication supports to give or receive feedback, please notify us using the contact information listed above.

Modifications to This or Other Policies

Any policy of Primo Foods Inc. that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Primo Foods Inc. – Multi-Year Accessibility Plan

Category: Information & Communication

Component	Deadline	Requirement	Action(s)
1. Feedback from Customers & Employees	1-Jan-2015	Sec. 11 Receiving and providing feedback in an accessible format	<p>Under the Customer Service Standard a feedback process was established for receiving and responding to feedback specifically about the manner in which Primo Foods provides accessible goods or services to people with disabilities. If feedback is elicited from employees, a variety of methods will be available and employees will be notified that if they require an accessible format to notify Primo Foods of their requirement for an accessible format.</p>
2. Accessible Formats and Communication Supports	1-Jan-2016	Sec. 12 Information about their goods and services or facilities	<p>The majority of Primo Foods documents and/or information are in an electronic or digital format which will facilitate the conversion into an accessible format. This will minimize the amount of time a customer/client will have to wait for an accessible document. Primo Foods shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. However, brochures produced outside the control of the corporation are not available in an accessible format at this time. This includes automobile manuals.</p>
		Sec. 12 Communication Supports	<p>Accessible formats and communication supports will be provided in a timely manner which takes into account the person's needs. The cost to provide this service shall not be incurred by the customer/client. The customer/client will be consulted with to determine the suitability of an accessible format or communication support. A list of local service providers will be on site to facilitate this process. Information about goods, services or facilities is available on the company website. If the customer/client requires additional supports, accessible formats of Primo Foods materials is available upon request and will be handled by the Human Resources (Email us at: website@primofoods.ca)</p>

3.	Unconvertible Information	1-Jan-2016	Sec. 12 Examples: blue prints or x-rays	Primo Foods does not create/produce the brochures, manuals, etc. for the products it sells. As a result, Primo Foods is not responsible for providing accessible formats for these items.
4.	Meeting requests in a timely manner	1-Jan-2016	Sec. 12 HTML, MS Word, accessible electronic formats	In some cases, Primo Foods will be able to provide the information or communications quickly. In other cases we will require more time due to the complexity of the document/drawing and resources or internal capacity of the organization. At most, customers/clients will receive accessible documents within 10 business days.
5.	Posting Requirements	1-Jan-2016	Sec. 12 Public must be notified about accessible formats & communication supports	Primo Foods will notify the public about the availability of accessible formats and communication supports via the company website. Alternately, the availability of accessible formats and communications will be made known during the check in of visitors at the reception desk.
6.	Emergency Procedures / Plan or Public Safety Information	1-Jan-2016	Sec. 13 If publicly available must also provide in an accessible format. i.e.: evacuation procedures, floor plans, Health & Safety information	Primo Foods provides health and safety information (personal protective equipment requirements) during sign in procedures at the reception desk. This information will be available upon request in an accessible format. The format is dependent upon the request of the individual. The reception staff will be trained on how to accommodate any requests received.
7.	Accessible Websites & Web Content	1-Jan-2014	Sec. 14 Applies to new internet websites & content WCAG20 (World Wide Web Consortium web content accessibility guidelines at Level AA)	Primo Foods does not have plans for a significant refresh (more than 50% of content, design or technology) of its website or a new url. Minor changes are done internally.
		1-Jan-2021	Sec. 14 All internet websites and web content	Significant changes to the website are handled by a contracted third party. The tips for working with web developers (Source: www.ontario.ca/AccessON , Information and Communications Standard) will be utilized to determine the level of knowledge the contracted, web developer has for implementing accessibility requirements.

Category: Employment

Component	Deadline	Requirement	Action(s)
<p>1. Recruitment, Assessment and Selection</p>	<p>1-Jan-2016</p>	<p>Sec. 22 Notify employees and public about availability of accommodation(s) for applicants in the recruitment process</p>	<p>Primo Foods utilizes in-house and 3rd party sources for recruitment. When third party sources (placement agencies) are utilized to fill a position, Primo Foods will ensure they are meeting the requirements under the AODA's Employment Standard and communicating the availability of accommodations for applicants in the requirement process. This can/will be done by adding a line in the job posting, communicating this information.</p>
	<p>1-Jan-2016</p>	<p>Sec. 23 Notify applicants who have been invited to participate in a recruitment, assessment or selection process that accommodations are available</p>	<p>Primo Foods will notify applicants when they are called for an interview about the availability of accommodations during the selection process. Managers/Supervisors calling an applicant for an interview will inform them of the availability of accommodations during the recruitment process.</p>
	<p>1-Jan-2016</p>	<p>Sec. 24 Offers of Employment - notify successful applicant of policies for accommodating employees with disabilities</p>	<p>Primo Foods will notify the successful applicant(s) of their policies for accommodating employees with disabilities. Notification may take a variety of forms such as in writing, verbal and as part of the orientation process.</p>
	<p>1-Jan-2016</p>	<p>Sec. 25 Informing Employees of Supports - all employees must be informed of polices used to support employees with disabilities (existing employees, new hires and when there is a change to the policy)</p>	<p>Primo Foods will inform all employees of their policies for supporting employees with disabilities. Notification may take several forms such as a staff memo or staff meetings. All new hires will be informed upon hire. Existing employees will be informed when there is a change to the policy for supporting employees with disabilities.</p>

2.	Accessible formats and communication supports for employees	1-Jan-2016	Sec. 26 Must provide in an accessible format information needed to perform the job and information which is generally available to employees in the workplace	Primo Foods will, upon request, consult with an employee with a disability to determine which accessible formats or communications supports they require to perform the duties of their job. An individual accommodation plan will be completed and the accessible formats and/or communication supports that will be provided to the employee will be noted in the plan.
3.	Workplace emergency response information	1-Jan-2012	Sec. 27 Provide individualized workplace emergency response information ; prepare for the specific needs employees with disabilities may have in emergency situations	Primo Foods will create an individualized workplace emergency response form for employees who have a disability and require accommodation(s)/supports to evacuate their workplace in an emergency. With the employee's consent, the person designated to provide assistance to the employee will be provided with the necessary information to assist the employee with the disability.
4.	Documented individual accommodation plans	1-Jan-2016	Sec. 28 Develop and document individual accommodation plans for employees with disabilities; employee involvement, outside medical or expert evaluation; review frequency	Primo Foods will create an individual accommodation plan for any employee for which they have been made aware has a disability. There may be times when Primo Foods will initiate a dialogue to offer assistance and accommodation for employees who are clearly unwell or perceived to have a disability. The employee will be included in the development of the plan. Primo Foods may seek outside medical or other expert evaluations in order to provide appropriate supports. The plan will be reviewed when there is a change in the employee's disability or job.
5.	Return to Work process	1-Jan-2016	Sec. 29 Develop and have in place a RTW process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work	Primo Foods shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The return to work process will be documented. If an individual's injury is covered by the return to work provisions of the Workplace Safety and Insurance Act, then that Act's return to work process would apply.

6.	Performance Management	1-Jan-2016	Sec. 30 Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, during the performance management process in respect to employees with disabilities	Under the AODA, the term performance management means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success. Primo Foods will consider the accessibility needs of employees with disabilities in the area of performance management.
7.	Career Development and Advancement	01-Jan-16	Sec. 31 Includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them	Primo Foods will take into account what accommodations employees with disabilities may need to succeed elsewhere in the organizations or to take on new responsibilities in their current position. If the employee has an individual accommodation plan in place, the plan must be updated to reflect the changes in their new responsibilities.
8.	Redeployment	01-Jan-16	Sec. 32 Reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization	In the event that Primo Foods will employ a redeployment process, it will consider the accessibility needs of employees with disabilities when moving them to other positions within the organization. If the employee has an individual accommodation plan, the plan will be reviewed and updated to reflect the changes in their new responsibilities

Part IV.I: Design of Public Spaces Standard (Accessibility Standards for the Built Environment)

1.	Exterior Paths of Travel	1-Jan-2017	<p>Sec. 80.21 Applies to newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience. O. Reg. 413/12, s. 6.</p>	<p>Primo Foods Inc. has not constructed or redeveloped an exterior path of travel since January 1, 2017. Should Primo Foods Inc. construct or redevelop an exterior path of travel in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.</p>
2.	Accessible Parking	1-Jan-2017	<p>Sec. 80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part. O. Reg. 413/12, s. 6.</p>	<p>Primo Foods Inc. has not constructed or redeveloped any accessible parking spaces since January 1, 2017. Should Primo Foods Inc. construct or redevelop accessible parking spaces in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.</p>
3.	Obtaining Services	1-Jan-2017	<p>Sec. 80.40 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas. O. Reg. 413/12, s. 6.</p>	<p>Primo Foods Inc. has constructed a new service counter since January 1, 2017. AODA requires service counters be at the height of someone on a mobility device. For further guidance on this requirement the CSA B651 – 12 was referenced to ensure service counters were at least 680 mm or 27 inches in height or a clear opening.</p> <p>Primo Foods Inc. has not constructed or redeveloped a fixed queuing guide or waiting area since January 1, 2017. Should Primo Foods Inc. construct or redevelop a service counter, fixed queuing guide or waiting area in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.</p>

4.	Maintenance of Accessible Elements	1-Jan-2017	Sec. 80.44 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces 2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6.	Primo Foods Inc.'s lease hold agreements require the leaser to ensure all accessible elements in common areas are maintained. Any accessible elements Primo Foods Inc. is solely responsible for have maintenance schedules as required under other legislation such as the TSSA for our elevators. Procedures for dealing with temporary disruptions have been established and communicated to associates.
----	---	------------	--	---