



Accessibility Policy & Multi-Year Plan 2023

Intent

This policy is intended to meet the requirements of *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 The Laking Group of Companies shall follow the principles of dignity, independence, integration, and equal opportunity.

Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by The Laking Group of Companies.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of The Laking Group of Companies, including when the provision of goods and services occurs off the premises such as in: delivery services, call centers, vendors, drivers, catering and third party marketing agencies.
- c) 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 The Laking Group of Companies.
- d) This policy shall also apply to all persons who participate in the development of The Laking Group of Companies' policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

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:

- 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.

General Principles

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Employment
- H. Training
- I. Notice of Availability and Format of Required Documents



A. The Provision of Goods and Services to Persons with Disabilities

The Laking Group of Companies will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible, to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- considering individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability

B. Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by The Laking Group of Companies.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by 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 guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

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 excluded by law (see applicable laws below) The Laking Group of Companies 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).

Applicable Laws:

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 Pitbull's) 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, The Laking Group of Companies 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 times.

Allergies:

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, The Laking Group of Companies will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a customer with a disability is accompanied by a support person, The Laking Group of Companies 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.



There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, The Laking Group of Companies 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.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of The Laking Group of Companies. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use The Laking Group of Companies' 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, The Laking Group of Companies 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 company's websites;
- 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.

F. Feedback Process

The Laking Group of Companies accepts feedback from the public in a variety of methods including:

- Phone
- In person or third person assistance
- Email
- Mail



All feedback is welcome and will be reviewed and addressed by Stefanie Cecchetto, HR Administrator. We will ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, upon request.

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Submitting Feedback:

Customers can submit feedback to:

Stefanie Cecchetto

Phone: 705-674-7534 ext 2288

Email: scecchetto@lakingtoyota.com

In person or by mail: 695 Kingsway Blvd, Sudbury ON P3B 2E4

G. Employment

The Laking Group of Companies is committed to fair and accessible employment practices. We will take reasonable steps to implement the following actions:

- We will notify the public and staff that, when requested, it will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.
- We will develop and put in place a process for developing individual accommodation plans for employees with disabilities.
- We will develop and put in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work.
- We will ensure the accessibility needs of employees with disabilities are considered if using performance management, career development and advancement, or redeployment processes.

H. Training

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of The Laking Group of Companies; for example: salespersons, drivers, vendors, event operators, call centers and third-party marketing agents; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:



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 your services.
- The Laking Group of Companies' policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

The Laking Group of Companies will provide training during onboarding/orientation or as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

The Laking Group of Companies will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

I. Notice of Availability and Format of Documents

The Laking Group of Companies shall notify customers that the documents related to accessible 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 in a conspicuous place at buildings owned and operated by The Laking Group of Companies, company's websites and/or any other reasonable method. We will provide the accessible format in a timely manner and, at no additional cost.

We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.



Multi-Year Accessibility Plan

Statement

The Laking Group of Companies 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 removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws.

The Laking Group of Companies is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. We understand 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.

The Laking Group of Companies 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.

Our accessibility plan is publicly posted on our website and other accessible formats are available upon request.

Strategy

- This policy and its related procedures will be reviewed once every five years or as required in the event of legislative changes.
- Feedback (internal and external) will always be welcomed in order to continue to identify, remove and prevent barriers to accessibility.
- We will continue to assess our training procedures, sites, communication, and customer service to identify and address/prevent any additional barriers that may arise.
- Any policy that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Maintenance

- The elevator at our Laking Toyota site undergoes regular preventative maintenance
- Accessible parking will be clear of any obstacles and will be maintained in the winter months.



- Any disruptions due to preventative and emergency maintenance will be posted using signage, explaining the disruption and a timeline for when it will be complete. Visitors will also be verbally notified when entering the building. Temporary accessibility will be made available accordingly.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Stefanie Cecchetto, HR Administrator

Phone: 705-674-7534 ext 2288

Email: scecchetto@lakingtoyota.com

In person or by mail: 695 Kingsway Blvd, Sudbury ON P3B 2E4

OR

Alyson Laking, Executive Manager

Phone: 705-674-7534 ext 2278

Email: alaking@lakingtoyota.com

In person or by mail: 695 Kingsway Blvd, Sudbury ON P3B 2E4

Referenced Documents

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Integrated Accessibility Standards, Ontario Regulation 191/11
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990