



## **Multi Year Accessibility Plan**

Reviewed: October 2022

### **Part 1: Introduction and Background Information**

Alpine Ski Club (ASC)

Alpine Ski Club is a private ski club located in the Blue Mountains on the Niagara Escarpment offering members access to on-hill ski and snowboard experiences. Après ski activities are organized for children, adults, teens, and families. Weekdays Alpine welcomes visiting groups by prior arrangement. Alpine consists of 120 acres and 760 feet of elevation and is home to 36 runs served by five lifts.

#### **Alpine Ski Club's Commitment to an Inclusive and Accessible Work Environment**

ASC is committed to excellence in treating customers and employees in a way that allows them to maintain their dignity and independence. Believing in integration and equal opportunity, ASC is committed to creating an inclusive culture across the organization by preventing and removing barriers for persons with disabilities and meeting the requirements under the Integrated Accessibility Standard Regulation (IASR) of the Accessibility for Ontarians with Disabilities Act (AODA).

#### **ASC's Commitment to Accommodation**

ASC is committed to making every reasonable effort to accommodate people with disabilities. Where it is not possible to remove barriers, ASC will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner, provided such accommodation does not cause ASC undue hardship.

#### **Business Case for Accessibility**

The AODA became law in June 2005, with the goal to ensure that all Ontarians with disabilities have full access to goods, services, facilities, accommodation, employment, building structures, and premises by January 1, 2025. It applies to every public organization and to private organizations in Ontario that have at least one employee, and builds on progress made under earlier legislation known as the Ontarians with Disabilities Act, 2001 (or the ODA).

More than 15% of Ontarians have a disability – that's 1.85 million people, or 1 in 7 people. The number of Ontarians with a disability will increase as our demographics evolve to include ageing populations; this market will continue to grow and drive society to meet their demands and needs as people look for accessible products and services for themselves and their families, both in their own communities and when travelling with others. People with disabilities have a discretionary spending power of \$25 billion in the Canadian economy.

Social responsibility is fast becoming a differentiator for business; it is part of a company's employment brand and customer brand. ASC is committed to preventing and removing barriers to our services and workplaces and although inclusivity and accessibility are law, we realize this makes sound business and economic sense. An accessible ASC allows us to deliver the highest standard of products and services to

our customers and retain diverse and talented employees – both of which set ASC’s competitive advantage as an employer of choice.

## **Part 2: Accessibility at ASC**

### **Accessibility Plan**

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations, including ASC, to ensure workplaces and services are fully accessible to the public and employees, including persons with disabilities.

The Integrated Accessibility Standard Regulation (IASR) requires every employer with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website by January 1, 2014. In accordance with the IASR, ASC’s Multi-Year Accessibility Plan outlines ASCR’s strategies to prevent and remove barriers to accessibility wherever possible.

How do I count the number of employees that I have?

To determine the size of your organization, and the requirements you must comply with, count all full-time, part-time, seasonal, and contract workers. Do not count volunteers and independent contractors such as plumbers and electricians. Employee size is determined by identifying your organization’s peak employee count at any one time over the previous twelve-month period. Employees based outside of Ontario, volunteers and independent contractors are not included for counting purposes.

The objective of the Multi-Year Accessibility Plan is to support ASC’s compliance with the AODA and the IASR and continue to ASC’s commitment to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

### **Barrier Assessment**

In accordance with the AODA and with ASC’s commitment to treating all people in a way that allows them to maintain their dignity and independence while creating memorable experiences for customers and an inclusive work environment for ASC’s employees. Our plan seeks to prevent and remove barriers to accessibility for persons with disabilities. In an effort to improve our understanding of the barriers to accessibility encountered at ASC, feedback was gathered from key members within the community and ASC employees who may have, or have an awareness of, disabilities.

A ‘barrier’ is anything that prevents a person with a disability from fully participating in one or more aspects of society because of his or her disability. Typical barriers to accessibility include architectural/physical, attitudinal, informational/communication, organizational/systemic, or technological barrier.

#### **Barrier Definitions**

1. Architectural/Physical: elements of buildings or outdoor spaces that create barriers to persons with disabilities. These barriers relate to elements such as the design of a building’s stairs or doorways, the layout of rooms, or the width of halls and sidewalks.
2. Attitudinal: behaviours, perceptions, and assumptions that discriminate against persons with disabilities. These barriers often emerge from a lack of understanding, which can lead people to ignore, to judge, or have misconceptions about a person with a disability.

3. Informational/Communication: occur when sensory disabilities, such as hearing, seeing, or learning disabilities, have not been considered. These barriers relate to both the sending and receiving of information.
4. Organizational/Systemic: policies, procedures, or practices that unfairly discriminate and can prevent individuals from participating fully in a situation. Organizational or systemic barriers are often put into place unintentionally.
5. Technological: occur when a device or technological platform is not accessible to its intended audience and cannot be used with an assistive device. Technology can enhance the user experience, but it can also create unintentional barriers for some users. Technology barriers are often related to information and communications barriers.

### **Part 3: Progressing Towards Accessibility**

#### **ASC's Accomplishments and Progress to Date:**

- AODA Committee – Customer Service Standard (2011 - 2012)
  - Creation of a dedicated group of frontline, leadership, and senior leadership employees whose mandate is to provide consultation to support ASC's overall AODA compliance for the Customer Service Standard.
- AODA Customer Service Standard Requirements: Completed December 2012
  - Club Policy, departmental procedures and training developed
  - Leader and front-line Accessible Customer Service training
  - Accessibility page on ASC Website
  - Audit of ASC buildings
  - Compliance report filed Dec 2012
- AODA Committee Phase 2 – Integrated Accessibility Standard Regulation (Created in 2014)
  - Created group of dedicated frontline and leadership employees whose mandate was to ensure ASC's adherence to the IASR, providing direction and vision for planning, reviewing, and evaluating the implementation of the AODA at ASC.
- AODA IASR Requirements: Information & Communication (Part II), Employment (Part III) (Completed December 2014)
  - Additions to employee training:
    - Employees providing emergency information to members upon request;
    - Helping employees with disabilities stay safe, i.e. individual emergency response plans.

Promote awareness regarding disabilities (i.e., education) through training sessions

- Compliance report filed December 2014
- Part IV.1 – Design of Public Spaces (2017)
  - Promote awareness of design specifications for newly constructed or redeveloped public spaces
  - Designed checklists for compliance, to ensure projects meet legislated requirements (if applicable)
  - Compliance report filed April 2017
- Accessible Project & Design Committee (created August 2017)
  - Group of dedicated frontline, leadership, and senior leadership employees whose mandate is to ensure ASC’s adherence to Part IV.1 – Design of Public Spaces of the IASR, providing direction, approval, and vision for planning and design of newly constructed or redeveloped public spaces owned by ASC.
  - Developed process and resources to assist Project Managers with applying the IASR requirements to their project where applicable, and documenting their project’s accessibility provisions through use of a designated checklist.

#### **Part 4: ASC’s Multi-Year Accessibility Plan**

##### **Part I: General Requirements**

###### **1.1 Establish Accessibility Policies**

**Compliance Date: January 1, 2014**

**Status: Complete**

**IASR Requirement:** Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation

**Action(s) Taken:** Developed and implemented IASR policy. Posted on ASC website, made available to all staff at orientation and any person upon request. Can be made available in an accessible format (to employees and the public) upon request. Will be reviewed and updated as required.

###### **1.2 Accessibility Plans**

**Compliance Date: January 1, 2014**

**Status: Complete**

**IASR Requirement:** Large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years.

**Action(s) Taken:** Multi-Year Accessibility Plan has been implemented and posted on ASC’s website, and can be made available in an accessible format upon request. The Plan is reviewed annually, and is diarized to be updated once every five (5) years. The Plan was updated in 2021, with the anticipated next scheduled update to be completed no later than by 2026.

### 1.3 Self-Service Kiosks

**Compliance Date: January 1, 2014**

**Status: Ongoing**

**IASR Requirement:** Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks (including Point of sale).

**Action(s) Taken:** When designing, procuring, or acquiring self-service kiosks, employees will have regard for the need of persons with disabilities. ASC will undertake designing a club-wide standard for self-service kiosks that incorporate the needs of persons with disabilities, and will train employees responsible for concept, specifications, construction, and procurement.

### 1.4 Training Compliance

**Date: January 1, 2015**

**Status: Complete**

**IASR Requirement:** Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all persons who are an employee of, or a volunteer with, the organization; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization

**Action(s) Taken:** Training has been developed on the IASR and the Human Rights Code as it pertains to persons with disabilities and is provided to employees, volunteers, persons who participate in developing policies and others who provide goods, services, or facilities on behalf of ASC. Training is updated as required, and records of training are kept with departmental managers.

## Part II: Information & Communication Standards

### 2.1 Feedback Process

**Compliance Date: January 1, 2015**

**Status: Complete**

**IASR Requirement:** Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request

**Action(s) Taken:** Process has been established for receiving and responding to feedback. The company's accessibility website recommends ways in which feedback can be made.

These include:

- Contact email: info@alpineskiclub.com monitored by Administration;
- Phone call which is triaged through Administration; or,
- In writing mailed to the company's address. All requests are escalated to the appropriate department leader for prompt follow up, which is standard practice for guest feedback/inquiries.

As standard practice, feedback is sent to the department leader for prompt follow up.

## **2.2 Accessible Formats & Communication Supports**

**Compliance Date: January 1, 2016**

**Status: Complete**

**IASR Requirement:**

- 1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,
  - (a) in a timely manner that takes into account the person's accessibility needs due to disability; and
  - (b) at a cost that is no more than the regular cost charged to other persons.
- 2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.
- 3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.
- 4) Every obligated organization that is required to provide accessible formats or accessible formats and communication supports by section 3, 4, 11, 13, 19, 26, 28, 34, 37, 44 or 64 shall meet the requirements of subsections (1) and (2) but shall do so in accordance with the schedule set out in the referenced section and shall do so only to the extent that the requirements in subsections (1) and (2) are applicable to the requirements set out in the referenced section

**Action(s) Taken:** Upon request, to the extent practicable, ASC will provide accessible formats and communication supports for persons with disabilities, consulting with the person making the request to determine the suitability of the accessible format or communication support.

The following statement has been included on our website:

Documentation

We are more than happy to provide you with documentation relating to our customer service standards and club accessibility policies. All documents, or the information contained in the document, will be provided in a format that takes into account the person's disability. Alternative formats are free of charge. Documents can be requested by phone, mail, e-mail, or by visiting administration area of the club. You can also contact us to request copies of our Multi-Year Accessibility Plan and AODA policies; alternate formats will be made available if needed.

## **2.3 Emergency procedures, plans, or public safety information**

**Compliance Date: January 1, 2012**

**Status: Ongoing**

**IASR Requirement:** In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

**Action(s) Taken:** Emergency procedures, plans, or public safety information that is publicly available, shall be provided in an accessible format or with appropriate communication supports, upon request, as soon as possible.

## **2.4 Accessible website and web content**

**Compliance Date: January 1, 2014 (WCAG 2.0 Level A new internet websites and web content)**

**Status: Ongoing**

**IASR Requirement:** Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.

**Action(s) Taken:** As of March of 2016, Alpine Ski Club has ensured the current website site is compliant with WCAG 2.0 Level A programming requirements and partially compliant with WCAG 2.0 Level AA programming requirements and is regularly being watched for errors and then updated. ASC will track issues as well as suggest edits to third party organizations working with us. Note - all WCAG 2.0 requirements only apply to websites, web content, and web-based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are practicable.

## **Part III: Employment Standards**

### **3.1 Recruitment, General**

**Compliance Date: January 1, 2016**

**Status: Complete**

**IASR Requirement:** Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes

**Action(s) Taken:** Language is included on job postings (internal and external) and our website, to inform applicants with disabilities that accommodation is available upon request.

### **3.2 Recruitment, Assessment, or Selection Process**

**Compliance Date: January 1, 2016**

**Status: Ongoing**

**IASR Requirement:**

1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.

2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

**Action(s) Taken:** Language is included on notifications for interview (email or phone) that informs the applicant that accommodation is available upon request. If accommodation is requested, the applicant will be consulted to find an appropriate solution to remove barriers. Recruitment process (assessment, location) will be reviewed on a continual basis to ensure barriers may be removed or accessible features provided, upon request.

### **3.3 Notice to Successful Applicants**

**Compliance Date: January 1, 2016**

**Status: Ongoing**

**IASR Requirement:** Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.

**Action(s) Taken:** Employees will be provided with accommodation policy information upon hire. Additional accommodation policy information will be provided to employees at orientation

**3.4 Informing Employees of Supports**

**Compliance Date: January 1, 2016**

**Status: Ongoing**

**IASR Requirement:**

- 1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.
- 2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.
- 3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability

**Action(s) Taken:** Facilitate new employee Orientation to provide AODA training and inform employees of policies and procedures.

Each department manager has access to ASC AODA policies and procedures are available for review upon request.

Employees will be informed on changes to accommodation policies/procedures by developing a process to communicate to all employees, and by updating policies on the website.

**3.5 Accessible Formats and Communication Supports for Employees**

**Compliance Date: January 1, 2016**

**Status: Ongoing**

**IASR Requirement:**

- 1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,
  - (a) information that is needed in order to perform the employee's job; and
  - (b) information that is generally available to employees in the workplace.
- 2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

**Action(s) Taken:** Educate employees and managers on the availability of accessible formats and communication supports, and the process for when a request is made.

Upon request, consult with the employee to determine suitable accessible formats and communication supports needed to perform the employee's job.

**3.6 Workplace Emergency Response Information**

**Compliance Date: January 1, 2016**

**Status: Complete**

**IASR Requirement:**



- 1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.
  - 2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.
  - 3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.
- Action(s) Taken:** Develop individualized emergency response procedures as soon as possible, upon request, for employees with disabilities. A "Individual Emergency Response Information Form" is available through department managers to assist in the development of these plans. Individualized emergency plans will include the ability to obtain consent from the individual requesting the accommodation to inform other support persons designated to provide assistance in the event of an emergency.
- Include information in the policy to outline the guidelines for reviewing an individual emergency plan due to a move, a change in accommodation needs, or changes to emergency response policies.

### **3.7 Documented Individual Accommodation Plans**

**Compliance Date: January 1, 2016**

**Status: Complete**

**IASR Requirement:**

- 1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.
- 2) The process for the development of documented individual accommodation plans shall include the following elements:
  1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
  2. The means by which the employee is assessed on an individual basis.
  3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
  4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
  5. The steps taken to protect the privacy of the employee's personal information.
  6. The frequency with which the individual accommodation plan will be reviewed and updated the manner in which it will be done.
  7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
  8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

**Action(s) Taken:** In Sept 2015, a policy and procedure for “Individual Accommodation Plans” was created and implemented to employees that outlines the steps required for the development and documentation of individual accommodation plans for employees with disabilities. In the documented plan includes the following, in an accessible format:

- Manner in which the employee can request.
- The circumstances in which medical or outside experts may be required.
- Incorporate confidentiality requirements and outline to whom and what information may be shared.
- Frequency in which the accommodation plan will be reviewed and updated.
- Communication plan to inform an employee if the accommodation has been denied. Leaders are educated on accommodation and accessibility policies and procedures for employees requesting individual plans.

### **3.8 Return to Work Process**

**Compliance Date: January 1, 2016**

**Status: Complete**

**IASR Requirement:**

- 1) Every employer, other than an employer that is a small organization,
  - (a) 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; and
  - (b) shall document the process
- 2) The return-to-work process shall,
  - (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and
  - (b) use documented individual accommodation plans, as described in section 28, as part of the process.
- 3) The return-to-work process referenced in this section does not replace or override any other return to work process created by or under any other statute.

**Action(s) Taken:** In Sept 2015, a policy and procedure for “Non-Work-Related Return to Work Disability Related Policy” was created and implemented to employees that outlines the steps required for employees who have been absent from work due to a non-work-related disability and who require accommodation in order to return to work. Notably, this policy is distinct from ASC’s Return to Work Policy under the Occupational Health and Safety Act and related regulations.

### **3.9 Performance Management**

**Compliance Date: January 1, 2016**

**Status: Ongoing**

**IASR Requirement:**

- 1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.
- 2) In this section, “performance management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

**Action(s) Taken:** Reviewed and updated current performance management processes and policies to ensure accessibility features are included. Upon request from the employee, ensure performance management processes incorporate accessibility features and any reasonable accommodation needs. Incorporated components in Leadership training on appropriate processes to ensure understanding of accessibility in the performance management process.

### **3.10 Career Development and Advancement**

**Compliance Date: January 1, 2016**

**Status: Ongoing**

**IASR Requirement:**

1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.

2) In this section, “career development and advancement” 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.

**Action(s) Taken:** Reviewed and updated career development and advancement practices to ensure accessibility needs and individual accommodation plans of employees with disabilities are taken into account. Upon request from an employee, provide any training and professional development materials in accessible formats.

### **3.11 Redeployment**

**Compliance Date: January 1, 2016**

**Status: Ongoing**

**IASR Requirement:**

1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

2) In this section, “redeployment” means the 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.

**Action(s) Taken:** Reviewed and updated current redeployment practices to ensure accommodation plans are referenced, and ensure redeployment efforts take into account any accommodation needs of the employee. Modified training information for managers to include best practice information to ensure redeployment efforts/activities take into account an employee’s accommodation needs.

## **Part IV.1: Design of Public Spaces**

### **4.1.1 Recreation Trails & Beach Access Routes**

**Compliance Date: January 1, 2017**

**Status: Ongoing**

**IASR Requirement:** Trails applies to newly constructed and redeveloped recreational trails that an obligated organization intends to maintain, but does not apply to the following types of recreational trails:

1. Trails solely intended for cross-country skiing, mountain biking or the use of motorized snow vehicles or off-road vehicles.
2. Wilderness trails, backcountry trails and portage routes.

Beach access routes applies to newly constructed and redeveloped beach access routes that an obligated organization intends to maintain, including permanent and temporary routes and temporary routes that are established through the use of manufactured goods, which can be removed for the winter months.

Consultation, recreational trails

1) Obligated organizations shall consult on the following before they construct new or redevelop existing recreational trails:

1. The slope of the trail.
2. The need for, and location of, ramps on the trail.
3. The need for, location and design of,
  - i. rest areas,
  - ii. passing areas,
  - iii. viewing areas,
  - iv. amenities on the trail, and
  - v. any other pertinent feature.

2) Obligated organizations shall consult on the matters referred to in subsection (1) in the following manner:

3) Obligated organizations must consult with the public and persons with disabilities.

Obligated organizations shall ensure that any recreational trails and beach access routes that they construct or redevelop, and that they intend to maintain, meet the technical requirements as identified in the IASR, including requirements for boardwalks, ramps,

**Action(s) Taken:** The Accessibility Committee has determined that ASC is exempt from the requirements of Trails for the following:

- Ski trails
- Skating trails
- Mountain bike trails
- Hiking trails (considered wilderness trails as they extend from the bottom of the hill to the top)

In the event that a newly constructed or redeveloped trail and/or beach access route is deemed to require compliance, we will meet the technical requirements in accordance with the provisions of the IASR.

#### **4.1.2 Outdoor Public Use Eating Areas**

**Compliance Date: January 1, 2017**

**Status: Ongoing**

**IASR Requirement:** Requirements apply to newly constructed and redeveloped outdoor public use eating areas that an obligated organization, other than a small organization, intends to maintain and that are outdoor public use eating consisting of tables that are found in public areas, such as in public parks, on hospital grounds and on university campuses and are specifically intended for use by the public as a place to consume food.

Obligated organizations, other than small organizations, shall ensure that where they construct or redevelop outdoor public use eating areas that they intend to maintain, the outdoor public use eating areas meet requirements of the IASR, such as percentage of accessible tables, ground surface, and clear ground space around tables.

**Action(s) Taken:** In the event that a newly constructed or redeveloped outdoor public eating space is deemed to require compliance, we will meet the technical requirements in accordance with the provisions of the IASR.

#### **4.1.3 Outdoor Play Spaces**

**Compliance Date: January 1, 2017**

**Status: Ongoing**

**IASR Requirement:** Applies to newly constructed and redeveloped outdoor play spaces that an obligated organization, other than a small organization, intends to maintain that includes play equipment, such as swings, or features such as logs, rocks, sand or water, where the equipment or features are designed and placed to provide play opportunities and experiences for children and caregivers.

Consultation

When constructing new or redeveloping existing outdoor play spaces, obligated organizations, other than small organizations, shall consult on the needs of children and caregivers with various disabilities and shall do so in the manner of: The Government of Ontario, the Legislative Assembly, designated public sector organizations and large organizations must consult with the public and persons with disabilities.

Accessibility in Design

When constructing new or redeveloping existing play spaces that they intend to maintain, obligated organizations, other than small organizations, shall,

- (a) incorporate accessibility features, such as sensory and active play components, for children and caregivers with various disabilities into the design of outdoor play spaces; and
- (b) ensure that outdoor play spaces have a ground surface that is firm, stable and has impact attenuating properties for injury prevention and sufficient clearance to provide children and caregivers with various disabilities the ability to move through, in and around the outdoor play space.

**Action(s) Taken:** In the event that ASC builds new or redevelops existing owned outdoor play spaces, we will consult with the public and persons with disabilities, incorporate accessibility elements, and have regard for ground surfaces, where practicable, in accordance with the provisions of the IASR.

#### **4.1.4 Exterior Paths of Travel**

**Compliance Date: January 1, 2017**

**Status: Ongoing**

**IASR Requirement:**

- 1) This Part 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.
- 2) This Part does not apply to paths of travel regulated under Ontario Regulation 350/06 (Building Code) made under the Building Code Act, 1992.

When constructing new or redeveloping existing exterior paths of travel that they intend to maintain, obligated organizations, other than small organizations, shall ensure that new and redeveloped exterior paths of travel meet the technical requirements of the IASR for width, head room clearance, surface, opening size, running slope, and cross slope.

Certain technical requirements must be met when an exterior path of travel is equipped with a ramp, stairs, curb ramp, accessible pedestrian control signals, and rest areas.

**Action(s) Taken:** Where practicable, new 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 (including stairs, ramps, curbs, depressed curbs, pedestrian signals, rest areas), not to provide a recreational experience, we will meet certain technical requirements in accordance with the provisions of the IASR.

#### **4.1.5 Accessible Parking**

**Compliance Date: January 1, 2017**

**Status: Ongoing**

**IASR Requirement:** 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.

Off-street parking facilities must provide: Type A and Type B parking spaces, access aisles for all accessible parking spaces for the use of persons with disabilities, and a minimum number and type of accessible parking spaces, and signage according to the requirements of the IASR.

**Action(s) Taken:** Where practicable, new and redeveloped parking areas will meet certain technical requirements in accordance with the provisions of the IASR.

#### **4.1.6 Obtaining Services (Service Counters, Fixed Queuing Guides, Waiting Areas)**

**Compliance Date: January 1, 2017**

**Status: Ongoing**

**IASR Requirement:**

##### **Service Counters**

When constructing new service counters, which includes replacing existing service counters, requirements must be met for provision of minimum number of accessible service counters, ability to accommodate a mobility aid, and must abide by the countertop height, knee clearance, and floor area clearance requirements, as noted in the IASR.

##### **Fixed Queuing Guides**

When constructing new fixed queuing guides, the following requirements must be met:

- 1) The fixed queuing guides must provide sufficient width to allow for the passage of mobility aids and mobility assistive devices.
- 2) The fixed queuing guides must have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction.
- 3) The fixed queuing guides must be cane detectable.

##### **Waiting Areas**

When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating must be accessible, but in no case shall there be fewer than one accessible seating

For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait.

**Action(s) Taken:** Where practicable, all indoor or outdoor newly constructed services counters and fixed queuing guide and all newly constructed or redeveloped waiting areas will conform to all of the required elements in accordance with the provisions of the IASR.

#### **4.1.7 Maintenance of Accessible Elements**

**Compliance Date: January 1, 2017**

**Status: Ongoing**

**IASR Requirement:** In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following:

1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.
2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.

**Action(s) Taken:** Department managers have been informed that they must identify preventative and emergency maintenance procedures and alternatives for handling disruptions and alternatives in accordance with the provisions of the IASR, and that such procedures be documented accordingly in their businesses' standard operating procedures, with training provided to their employees.

### **Part IV.2: Customer Service Standard**

#### **4.2.1 Establishment of Policies**

**Compliance Date: January 1, 2012**

**Status: Complete**

**IASR Requirement:**

- 1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.
- 2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:
  1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.
  2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.
  3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.
  4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.
- 3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so.

4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person.

5) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request.

6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances

**Action(s) Taken:** In 2012, ASC implemented an AODA Committee to audit the service operations and developed and implemented policies for the provision of goods and services to persons with disabilities.

ASC has created policy and incorporated it with their departmental orientation training for new employees and for returning employees.

#### **4.2.2 Use of Service Animals and Support Persons**

**Compliance Date: January 1, 2012**

**Status: Complete**

##### **IASR Requirement:**

1) This section applies if goods, services or facilities are provided to members of the public or other third parties at premises owned or operated by the provider and if the public or third parties have access to the premises.

2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.

3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.

4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,

(a) 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; and

(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.

6) If an amount is payable for a person's admission to the premises or in connection with a person's presence on the premises, the provider shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person.

7) If, under subsection (5), the provider requires a person with a disability to be accompanied by a support person when on the premises, the provider shall waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.



8) Every provider, other than a small organization, shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person.

9) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request.

10) The notice required by subsection (9) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances

**Action(s) Taken:** Provisions for use of Service Animals and Support Persons have been included in ASC's Accessible Customer Service Policy and posted publicly on the Accessibility page of our website.

**Service Animals** – ASC welcomes people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties and the animal is not otherwise excluded by law.

**Support Persons** – ASC welcomes people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. A support person will receive a complimentary ticket to access Alpine Ski Club ski lifts and lessons when accompanying a customer with a disability, and tickets can be requested through administration or the mid week group coordinator.

#### **4.2.3 Notice of Temporary Disruptions**

**Compliance Date: January 1, 2012**

**Status: Complete**

**IASR Requirement:**

1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.

2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.

4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request.

5) The notices required by subsections (2) and (4) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.

**Action(s) Taken:** Notice of Temporary Disruptions have been included in ASC's Accessible Customer Service Policy and posted publicly on the Accessibility page of our website.

#### 4.2.4 Training for Staff, etc.

**Compliance Date: January 1, 2012**

**Status: Ongoing**

**IASR Requirement:**

1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:

1. Every person who is an employee of, or a volunteer with, the provider.
2. Every person who participates in developing the provider's policies.
3. Every other person who provides goods, services or facilities on behalf of the provider.

2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:

1. How to interact and communicate with persons with various types of disability.
2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

3) Every person referred to in subsection

- (1) shall be trained as soon as practicable.

4) Every provider shall also provide training on an ongoing basis in respect of any changes to the policies described in section 80.46.

5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.

6) Every provider, other than a small organization, shall,

- (a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and
- (b) on request, give a copy of the document to any person.

7) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on request.

8) The notice required by subsection (7) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances

**Action(s) Taken:** Training has been developed on the IASR and the Human Rights Code as it pertains to persons with disabilities and is provided to employees, volunteers, persons who participate in developing policies and others who provide goods, services, or facilities on behalf of ASC. Training is updated as required, and records of training are kept with Human Resources and/or departmental managers.

#### **4.2.5 Feedback Process Required**

**Compliance Date: January 1, 2012**

**Status: Complete**

**IASR Requirement:**

- 1) Every provider shall establish a process for receiving and responding to,
  - (a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and
  - (b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).
- 2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.
- 3) Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.
- 4) Every provider shall make information about the feedback process readily available to the public.
- 5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person
- 6) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (5) is available on request.
- 7) The notice required by subsection (6) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.

**Action(s) Taken:** Process has been established for receiving and responding to feedback. A dedicated email address [info@alpineskiclub.com](mailto:info@alpineskiclub.com) is available on the club website, which is monitored by Administration. Requests are escalated to the appropriate department manager for prompt follow up.

#### **4.2.6 Format of Documents**

**Compliance Date: January 1, 2012**

**Status: Ongoing**

**IASR Requirement:**

- 1) The provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,
  - (a) in a timely manner that takes into account the person's accessibility needs due to disability; and
  - (b) at a cost that is no more than the regular cost charged to other persons.
- 2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support.

**Action(s) Taken:** Upon request, ASC will provide information in an accessible format, in a timely manner, upon consultation with the person making the request.

### **Conclusion**

Alpine Ski Club is committed to treating all people in a way that allows them to maintain their dignity and independence, while creating memorable experiences for customers and an inclusive work environment for employees. As such, in accordance with the AODA legislation, this Multi-Year Accessibility Plan is posted on the company website and will be reviewed at least every (5) years, with the anticipated next scheduled update to be completed no later than by 2027.

Feedback: If you have questions or feedback relating to ASC's Multi-Year Accessibility plan, please email [info@alpineskiclub.com](mailto:info@alpineskiclub.com) or call 705-445-0339.