

	<b>ACCESSIBILITY POLICY</b>	Document No. NF-HS-26 AP
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## 1. PURPOSE

Nature Fresh Farms Corporate Accessibility Policy establishes a framework for compliance with the commitment to accessibility, requirements of the:

- [Accessibility for Ontarians with Disabilities Act](#) (AODA)
- [Integrated Accessibility Standards Regulation](#) (IASR)

Under the AODA, and additional Nature Fresh Farms requirements.

Nature Fresh Farms is committed to building an inclusive workplace that values the contributions of people with disabilities. It is committed to providing an accessible environment in which people with disabilities can access the Farms' services, and facilities, including all buildings, public spaces, information, and communications, in a way that meets their individual needs. Nature Fresh is committed to the identification, removal, and prevention of accessibility barriers, including attitudinal, systemic, information, communications, and technology, and built environment and physical barriers.

The AODA provides for the development, implementation, and enforcement of accessibility standards in order to achieve accessibility for persons with disabilities in all aspects of society. Nature Fresh must meet requirements in key areas including:

- General Requirements (Procurement, Training and Policy)
- Information and Communication
- Customer Service
- Employment
- Transportation
- Built Environment and Public Spaces.

All Nature Fresh Farms policies, procedures, standards, and guidelines must comply with the AODA, and provide for dignity, independence, integration and equal opportunity for people with disabilities. In all key areas listed above, the AODA requires Nature Fresh to:

- identify, prevent, and remove barriers people with disabilities face in accessing Nature Fresh's goods, services, and facilities
- accommodate the accessibility needs of people with disabilities to ensure they can obtain, use, or benefit from Nature Fresh services, and facilities, and that they can do so in a timely manner, at a cost no greater than the cost for people without disabilities
- develop and train employees on providing accessible goods, services, and facilities.

## 2. SCOPE

This Policy applies to all Nature Fresh Farms employees.

Any individual or third-party organization that provides goods, services, and facilities on behalf of Nature Fresh Farms, is also required to demonstrate compliance with AODA.

The Employment Standards Requirements in Section 8 apply only to employees of Nature Fresh Farms.

### **3. PRINCIPLES**

Nature Fresh Farms goods, services and facilities are to be available to people with disabilities in a manner that:

- is free from discrimination
- strives at all times to respect the individual's dignity and independence
- is integrated with the provision of service to others, except when alternative measures are necessary to meet the needs of people with disabilities
- takes individual needs into account where a uniform response is inappropriate, to ensure that there are no barriers to access or participation, and that individuals with disabilities are treated equally.

### **4. RESPONSIBILITIES**

Accessibility is a shared responsibility, and everyone has a part to play in making Nature Fresh Farms accessible to visitors, and co-workers, as described in the following roles and responsibilities.

#### **4.1 Employees, Volunteers and Third Parties**

All employees and other persons acting on behalf of the Nature Fresh must:

- have thorough knowledge of and maintain compliance with this Policy
- be familiar with their rights and responsibilities under this Policy
- prevent accessibility barriers by including accessibility considerations in the development of goods, services and facilities
- participate in identifying accessibility barriers and planning for barrier removal
- provide a welcoming environment for people with disabilities, including any person with a disability using assistive devices or accompanied by a support person or service animal
- communicate with persons with disabilities in a manner that takes into account their disability
- provide information and communications in accessible formats upon request, or with communication supports, consulting with the requestor about their preferred format
- facilitate the process of receiving and responding to feedback about the manner that Nature Fresh provides goods, services, and facilities to persons with disabilities, and ensure all feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports upon request

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- request support from supervisors, managers, directors, division heads or the H&S Department when accommodation requests are outside their area of responsibility, or beyond their capacity
- complete mandatory training on the AODA, the Human Rights Code and providing customer service to people with disabilities, as well as any additional training appropriate to the duties of their role as outlined in Section 5.4 of this policy.

#### 4.2 Supervisors, Managers and Directors

In addition to the roles and responsibilities in Section 4.1 of this Policy, individuals with management and supervisory roles must:

- provide leadership in building an inclusive and accessible environment for the public and employees
- facilitate requests for accommodation by members of the public and employees with disabilities in a timely manner, to the point of undue hardship, in accordance with the [Ontario Human Rights Code](#)
- prevent barriers by including accessibility considerations in the development of new policies, practices, or procedures
- ensure that the Policy is communicated to all Nature Fresh employees and those acting on behalf of the Nature Fresh Farms
- promote awareness of the Policy within their area of responsibility
- monitor current practices and ensure that management and staff are held accountable for their responsibilities under the Policy
- act on non-compliant issues within their area of responsibility
- ensure employees and persons who participate in developing Nature Fresh policies complete mandatory training requirements on the Accessibility for Ontarians with Disabilities Act as describe in Section 5.4 of this policy
- consult with HR and H&S Departments for assistance with accessibility issues.

#### 4.3 HR and H&S Department Role Under the AODA

Nature Fresh Farms HR and H&S Department is required under AODA. The mandate of these departments is to:

- provide advice to Management and Department Heads on the requirements and implementation of AODA accessibility standards, preparation of accessibility reports and any other AODA advice
- perform other functions specified in the IASR, including to be consulted on the Nature Fresh Farms Multi-Year Accessibility Plan (MYAP)
- provide advice to Nature Fresh on the prevention and elimination of barriers faced by persons with disabilities in order to achieve accessibility with respect to Nature Fresh policies, goods, services and programs, employment, facilities, buildings, structures, and premises

## 5. GENERAL REQUIREMENTS

Nature Fresh Farms will ensure the general requirements of the [Integrated Accessibility Standards Regulation](#) (IASR) under the AODA are met in order to achieve accessibility for persons with disabilities.

### 5.1 Accessibility Policies

The AODA requires Nature Fresh to maintain one or more policies governing how the organization will achieve the requirements of the IASR. Nature Fresh must also make such documents available to the public, and in accessible formats upon request. This Policy is adopted in compliance with this obligation.

### 5.2 Multi-Year Accessibility Plan

The AODA requires Nature Fresh to establish, implement, maintain and make public a Multi-Year Accessibility Plan outlining the corporate strategy to identify, remove and prevent barriers and to meet the legislated requirements of the IASR. The plan must be posted on the Nature Fresh Farms website and made available in an accessible format or with appropriate communications supports as soon as possible upon request.

### 5.3 Procurement of Goods, Services and Facilities

As required by the AODA, when acquiring or procuring goods, services, and facilities, the Nature Fresh must incorporate accessibility criteria and features, and will do so as early as possible in the procurement process. Where it is not practicable to do so, an explanation must be provided upon request.

### 5.4 Training

The AODA requires that all employees, volunteers and persons who participate in developing Nature Fresh Farms policies or who provide goods, services or facilities on behalf of Nature Fresh receive training on the AODA, the *Ontario Human Rights Code*, and Accessible Customer Service. Training must take place as soon as practicable after starting at Nature Fresh and be appropriate to the person's duties.

Nature Fresh must keep a record of the training, including the dates on which accessibility training took place and the names of individuals trained.

Training must include:

- The purpose of the AODA and related Nature Fresh policies
- Requirements of AODA Standards under the IASR (as appropriate to the person's duties)
- The Ontario Human Rights Code as it pertains to persons with disabilities
- Accessible Customer Service.

Training on specific accessibility standards according to the person's duties include:

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1. Information and Communications Standards – for employees whose duties and responsibilities involve communicating with, giving information to or receiving information from others.
2. Employment Standards – for employees involved in any aspect of the employment cycle, including recruiting, hiring, and retaining.
3. Transportation Standards – for employees who provide conventional and specialized transportation services.
4. Training may also include how to use and maintain assistive devices at a specific location (e.g. TTY, assistive listening devices).

Nature Fresh will also provide training on an ongoing basis in respect of any changes to this policy

## **6. INFORMATION AND COMMUNICATION REQUIREMENTS**

Nature Fresh will provide accessible information and communication by preventing and removing barriers, and providing accessible formats or communication supports to individuals that identify a barrier to accessibility. This section of the Policy addresses Nature Fresh’s requirements of the IASR Information and Communications Standards under the AODA.

### **6.1 Accessible Formats and Communication Supports**

The AODA requires that all information and communications that Nature Fresh produces, directly or indirectly through contractual relationships, must be made available in accessible formats upon request.

When an accessible format or communication support is requested, Nature Fresh must consult with the person making the request to determine which format or support is required and provide or make arrangements to provide the material in a reasonable amount of time and at no additional cost to the requestor.

Nature Fresh’s Accessible Information, Communications, and Technology Guidelines provide technical guidance for achieving accessibility in a broad range of materials and technology environments.

IASR Information and Communication Standards do not apply to products and product labels, unconvertible information or communications, and information that Nature Fresh does not control directly or indirectly through a contractual relationship.

If, in consultation with the HR and H&S department, the information or communication is determined to be unconvertible, Nature Fresh must provide the person requesting the information or communication with:

- an explanation as to why the information or communications are unconvertible, and
- a summary of the unconvertible information or communications.

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## 6.2 Notice of Availability of Documents

This Policy will be maintained by the HR and H&S Department and available on the [Nature Fresh Website](#). The Policy must be provided to individuals, upon request, in the appropriate format or with communication supports.

## 6.3 Accessible Websites and Web Content

The AODA requires that Nature Fresh’s internet website and web content, controlled directly by Nature Fresh, must conform to World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, in accordance with the timelines set out in the IASR and in the Accessible Information, Communications, and Technology Guidelines.

Nature Fresh’s IT and Communications Department, in consultation with the HR and H&S Department, are responsible for establishing and maintaining procedures, standards and guidelines to ensure all internet websites and web content is accessible.

Nature Fresh divisions that manage their content on the Nature Fresh website are responsible for ensuring accessibility based on approved procedures, standards, and guidelines, with support from the IT and Communications Department.

## 6.4 Emergency Procedures, Plans or Public Safety Information

The AODA requires that Nature Fresh Farms emergency procedures and plans, must be made available in an accessible format or with appropriate communication supports as soon as possible upon request.

## 6.5 Feedback

Nature Fresh Farms must have a process in place for receiving and responding to feedback, including feedback on how services are delivered to people with disabilities. Nature Fresh must make feedback processes accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request.

Feedback will be collected by [Completing the Feedback Form](#).

# 7. CUSTOMER SERVICE REQUIREMENTS

Nature Fresh Farms will strive for excellence in serving all customers including people with disabilities and is committed to meeting obligations under the [Ontario Human Rights Code](#) and the AODA.

## 7.1 Assistive Devices

The AODA requires Nature Fresh Farms to allow persons with disabilities to use their own assistive devices to obtain, use or benefit from the goods, services, and facilities of Nature Fresh.

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In circumstances where a person with a disability is unable to access the Nature Fresh services through the use of their own personal assistive device, Nature Fresh must assess service delivery and potential service options to meet the needs of the individual, in accordance with the Ontario Human Rights Code and Nature Fresh’s [Accommodation Policy](#).

### 7.3 Support Persons

Where a person with a disability accessing Nature Fresh goods, services, or facilities is accompanied by a support person, the AODA requires Nature Fresh to ensure that both persons are permitted to enter the premises together and the person with a disability is not prevented from having access to the support person while on the premises.

Nature Fresh may require a support person to accompany a person with a disability for reasons of health and safety – either for the person with a disability or others on the premises. This should only occur where after consulting with the person it is determined that based on the person’s needs and available evidence:

1. A support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises, and
2. There is no reasonable way to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Any considerations on protecting health and safety must be based on specific evidence and not on assumptions.

### 7.4 Service Animals

The AODA requires that persons with disabilities accompanied by their service animal must be permitted to keep that animal with them in premises that members of the public are permitted to enter.

In the event the animal is excluded by law, such as in a food preparation or growing area, Nature Fresh must ensure other measures are available to enable the person with a disability to obtain, use or benefit from Nature Fresh goods, services, and facilities. Staff will respectfully explain why the animal is excluded and determine what other arrangements can be made.

A person with a disability is responsible for the control of their service animal at all times. If the service animal is not kept under control, has bitten another person or animal, or is a menace to the safety of other persons or animals, the service animal may be required to leave the premises. If this occurs the person will be permitted to continue to access Nature Fresh goods or services without the animal. In addition, Nature Fresh employees will, upon request, consider alternate accommodations for the person in such circumstances. Nature Fresh may refuse to permit the service animal to accompany the person until steps have been taken to correct the situation, and the issue has been resolved.



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### 7.5 Notice of Service Disruptions

The AODA requires Nature Fresh to give notice of any temporary planned or unplanned service disruption of facilities, services or systems that are relied upon by people with disabilities to access Nature Fresh goods, services or facilities, such as elevators, lifts, or accessible washrooms. In the event of an unexpected disruption, notice must be provided as soon as possible.

Notice must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities, services or systems that are available.

Notice must be given by posting the information in a prominent place on premises owned or operated by the provider, posted on Nature Fresh’s website.

## **8. EMPLOYEMENT STANDARDS REQUIREMENTS**

Nature Fresh Farms will foster an inclusive workforce and provide equitable treatment and accommodation to ensure barrier-free employment. The requirements in this section apply only to employees of Nature Fresh Farms. Contractors and other non-paid individuals are not captured under this section. This section addresses Nature Fresh’s requirements of the IASR Employment Standards under the AODA.

### 8.1 Recruitment, Assessment and Selection Process

Nature Fresh Farms must post information about the availability of accommodations for internal and external job applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing must be notified that accommodations are available on request. Nature Fresh must consult with an applicant who requests an accommodation and, in accordance with the [Ontario Human Rights Code](#) and the City’s [Accommodation Policy](#), will provide or arrange for the provision of a suitable accommodation in a timely manner that takes into account the applicant’s accessibility needs due to disability. Successful applicants must be notified about Nature Fresh’s policies for accommodating employees with disabilities as part of their offer of employment.

### 8.2 Employee Supports

Nature Fresh Farms employees must be made aware of the policies used to support employees with disabilities and accommodations available in accordance with the Ontario Human Rights Code and company Accommodation Policy. Nature Fresh provides this information to new employees through employment agreements and orientation materials and must provide updated information to all 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.

### 8.3 Accessible Formats and Communication Supports for Employees

In accordance with the Ontario Human Rights Code and company Accommodation Policy upon an employee’s request, Nature Fresh must consult with the employee to



provide or arrange for the provision of accessible formats and communication supports for:

- information that is needed to perform the employee’s job
- information that is generally available to employees in the workplace.

Nature Fresh must consult with the employee making the request in determining the suitability of an accessible format or communications support.

#### 8.4 Workplace Emergency Response Information

Nature Fresh Farms will provide individualized emergency response information to employees who identify potential accessibility barriers when responding to emergency situations. Information on individualized workplace emergency response must be provided to the employee as soon as practicable after becoming aware of the need for accommodation due to the employee’s disability. If the employee requires assistance, Nature Fresh must receive consent from the employee to provide the individualized emergency response information to the person(s) designated to provide assistance. The information must be reviewed when the employee moves to a different location, when the employee’s accommodation needs change, when overall accommodation plans are reviewed and when Nature Fresh reviews its general emergency response plan.

#### 8.5 Individual Accommodation Plans

Nature Fresh’s [Accommodation Policy](#) describes the mandatory process for the development and maintenance of documented individual accommodation plans to support employees with disabilities. The process set out in the policy meets requirements of the AODA. If applicable, individual accommodation plans may include information regarding plans for accessible formats and communication supports, as well as individualized workplace emergency response information.

#### 8.6 Return to Work Process

Nature fresh Farms [Return to Work](#) policy describes the return to work process for employees returning to work following an illness or injury where disability-related accommodations are required. This requirement is met through return-to-work processes supported by H&S staff consistent with the collective agreements and return to work protocols.

#### 8.7 Performance Management, Career Development, and Redeployment

Nature Fresh Farms will ensure employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management and redeployment opportunities.

**9. AODA REPORTING REQUIREMENTS**

Nature Fresh Farms must submit completed compliance reports to the province every two years, in accordance with the schedule set out in the AODA.

**10. CONTRAVENTIONS**

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal. Nature Fresh's failure to comply with AODA may result in significant fines and reputational damage.

**11. AUTHORITY**

Nature Fresh Farms HR and H&S departments has the authority to make changes to the policy as required.

**12. REFERENCES**

[Return to Work](#)

[Nature Fresh Multi Year Accessibility Plan 2021-2025](#)

[Accommodation Policy](#)

[Ontario Human Rights Code](#)

[Integrated Accessibility Standards Regulation](#)

[Accessibility for Ontarians with Disabilities Act](#)

**Feedback**

<https://forms.office.com/r/GPyRk6pk1h>