

CLUB ITALIA ACCESSIBILITY POLICY

Dated 15 February 2023

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AODA POLICY

ACCESSIBILITY POLICY & MULTI-YEAR ACCESSIBILITY PLAN

This 2023 accessibility plan outlines the policies and actions that Club Italia will put in place to improve opportunities for people with disabilities and to comply with the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA").

STATEMENT OF COMMITMENT

Club Italia is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

Further, Club Italia is committed to meeting its obligations under the Ontario Human Rights Code, including accommodation of employees, part-timers, volunteers, and guests of Club Italia with disabilities.

Club Italia 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 and be consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

ACCESSIBLE EMERGENCY INFORMATION

Club Italia is committed to providing its guests and the public with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information, when necessary, as described below.

TRAINING

Club Italia provides training to its employees, volunteers, part-timers and other staff members on Ontario's accessibility laws, the Ontario Human Rights Code and Accessible Customer Services as it relates to people with disabilities.

Club Italia will provide training to every person as soon as practicable after being hired and provide training in respect of any changes to the policies. Club Italia maintains records of the training provided, including the dates on which the training was provided and the names of those trained. Training will include:

- The purpose of AODA and the related Club Italia polices.
- The requirements of AODA Standards under the Integrated Accessibility Standards Regulation (IASR).
- The Ontario Human Rights Code as it pertains to persons with disabilities.
- Accessible Customer Service.

Club Italia will provide employees with written training materials and/or a presentation, including the following:

- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- what to do if a person with a disability is having difficulty in accessing Club Italia's services or facilities
- the requirements of the Code as it pertains to persons with disabilities.

INFORMATION AND COMMUNICATIONS

Club Italia will communicate with people with disabilities in ways that take into account their disability.

Club Italia's Website and content on the Website conforms with internationally recognized WCAG 2.2 Level A and AA standards. Any revisions to the website will be done in accordance with Ontario's accessibility laws.

Club Italia is taking the following steps to make sure all publicly available information, including public safety information, is made accessible upon request:

- Club Italia will provide guests and members of the public with information in an accessible format or with communication supports upon request.
- Club Italia will respond to such requests as soon as practicable.
- At a cost that is no more than the regular cost charged to other persons.

Club Italia will consult with the person making the request in determining the suitability of an accessible format or communication support. If Club Italia determines that information or communications are unconvertible, Club Italia shall provide the requestor with:

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

Club Italia will notify the public about the availability of accessible formats and communication supports by posting our Accessibility Policy and Multi-Year Plan on our website and other means.

FEEDBACK

Club Italia welcomes any feedback, complaints or questions regarding the methods it uses to provide goods and services to persons with disabilities. Club Italia is also committed to ensuring that its feedback process is accessible by providing or arranging for accessible formats and communication supports, upon request.

Every complaint will be reviewed and assessed by Club Italia's Accessibility Committee. Where possible, the Accessibility Committee will address the issues raised in the complaint. If a complaint cannot be addressed, the Accessibility Committee will advise the complainant.

Individuals may provide their feedback, complaints or questions in person, by telephone, in writing, or by, or otherwise, to the General Manager of Club Italia.

Telephone: 905-374-7388

Email: gm@clubitalia.ca

Mail: 2525 Montrose Road, Niagara Falls, Ontario, L2H 0T9

EMPLOYMENT

Club Italia is committed to fair and accessible employment practices.

Club Italia will take the following steps to notify the public, job applicants, employees, parttimers, and volunteers that when requested, Club Italia will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- Prospective applicants will be advised of the availability of accommodations by the General Manager.
- Club Italia will notify applicants and employees of its ability to provide accommodations on any job postings.

When making offers of employment, Club Italia will advise successful applicants that it has policies for accommodating employees, part-timers, and volunteers with disabilities.

Club Italia will notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We will provide updated information to employees, part-timers and volunteers whenever there is a change to existing policies on the provision of job accommodation.

Club Italia will consult with employees, part-timers and volunteers when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. Club Italia will consult with the person making the request in

determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's, part-timers and volunteer's job; and
- b) information that is generally available to employees, part-timers, and volunteers in the workplace.

Where needed, Club Italia will also provide customized emergency information to help an employee, part-timers and volunteers with a disability during an emergency. With the employee's, part-timers and volunteers' consent, Club Italia will provide workplace emergency information to a designated person who is providing assistance to that employee, part-timer and volunteer during an emergency.

Club Italia will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's, part-timers and volunteers disability.

Club Italia will review the individualized workplace emergency response information:

- a) when the employee, part-timer and volunteer moves to a different location within the banquet facility;
- b) when the employee's, part-timers and volunteers overall accommodations needs or plans are reviewed; and
- c) when we review Club Italia's general emergency response policies.

Club Italia has a process for developing individual accommodation plans and return-towork policies for employees, part-timers and volunteers that have been absent due to a disability.

Club Italia ensure the accessibility needs of employees with disabilities are taken into account when using performance management, career development and redeployment processes.

For further information regarding accommodation of employees, part-timers and volunteers with disabilities, please contact General Manager of Club Italia.

DESIGN OF PUBLIC SPACES

Club Italia will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to its offices in public spaces.

SERVICE DISRUPTION

In the event of a service disruption, Club Italia will notify the public of the service disruption and alternatives available.

POLICY REVIEW

Club Italia will review and update this policy at least once every five years.

Club Italia will maintain this Accessibility Policy and Accessible Customer Service Plan, which includes our policies, practices and procedures with respect to the following:

- Use of support persons.
- Use of guide dogs or service animals.
- The steps to be taken in connection with a temporary disruption.
- The training policy, including a summary of the contents of the training and details of when the training is to be provided.
- Records of the training provided under this policy, including the dates on which the training is provided and the number of individuals to whom it is provided.
- The feedback process.

Club Italia will notify persons to whom it provides goods and services of its Accessibility Policy and Accessible Customer Service Plan, by posting the information at a conspicuous place on Club Italia's premises, on Club Italia's website or by such method as is reasonable in the circumstances.

For More Information

For information and updates with respect to Club Italia's accessibility policies, please contact the General Manager of Club Italia

Telephone: 905-374-7388

Email: gm@clubitalia.ca

Mail: 2525 Montrose Road, Niagara Falls, Ontario, L2H 0T9

Note: Accessible formats of this document are available free upon request.

ACCESSIBLE CUSTOMER SERVICE PLAN

Club Italia is committed to excellence in serving all guests, including people with disabilities.

1. PURPOSE

The purpose of the Accessible Customer Service Plan is to ensure that Club Italia provides goods and services in accordance with the principles below and complies with the AODA and the Code.

Club Italia will use reasonable efforts to ensure that its policies, practices and procedures governing the provision of its services to persons with disabilities are consistent with the following principles:

- Goods and services are provided in a way that respects the dignity and independence of persons with disabilities;
- Persons with disabilities are able to benefit from the same services, in the same place and in a similar way as other clients;
- Persons with disabilities have opportunities equal to others to obtain, use and benefit from Club Italia's facilities, goods or services.

2. DEFINITIONS

"Disability" means,

- 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,
- 2. A condition of mental impairment or a developmental disability,
- 3. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- 4. A mental disorder, or
- 5. 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" means a dog trained as a guide for a person who is blind or visually impaired.

"Service animal" means an animal for a person with disabilities where it is readily apparent that the animal is used by the person for reasons relating to his or her disability or where the person provides a letter from a regulated health professional confirming that he or she requires the animal for reasons relating to the disability.

"Support person" means, in relation to a person with disabilities, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods and services.

3. PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Club Italia is committed to excellence in serving all guests, including persons with disabilities, and will carry out its functions and responsibilities by,

- Communicating with persons with disabilities in ways that take into account their disability;
- Serving persons with disabilities who use assistive devices. Club Italia will provide its staff with training on how to use any assistive devices available on Club Italia's premises;
- Ensuring that persons with disabilities who are accompanied by their guide dog or other service animals are permitted to enter the premises of Club Italia with the animal and to keep the animal with them, unless the animal is excluded by law from the premises;
- Ensuring that persons with disabilities who are accompanied by a support person are permitted to enter Club Italia banquet hall and outdoor facilities with their support person.

4. SERVICE ANIMALS

A person with disabilities may be accompanied by a guide dog or other service animal when on Club Italia's premises and outdoor facilities. Club Italia reserves the right to request that the person with a disability provide documentation from a regulated health professional where it cannot easily identify that the animal is a service animal. In the event that service animals are excluded by law from the premises, Club Italia will provide other resources or supports to enable the person with disabilities to access the services and goods offered by Club Italia.

5. SUPPORT PERSONS

Person with disabilities may enter Club Italia premises with a support person and have access to the support person while on Club Italia's premises or outdoor facilities.

Club Italia does not charge fees for support persons, or if fees are charged for admission to the premises (e.g., special Club Italia events), Club Italia shall provide notice of the amount in advance.

Club Italia may require persons with disabilities to be accompanied by a support person when on Club Italia premises or outdoor facilities, but only if a support person is necessary to protect the health and safety of the person with disabilities or the health or safety of others on the premises or outdoor facilities. Before requiring the person with a disability to be accompanied by a support person, Club Italia will:

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

6. NOTICE OF TEMPORARY DISRUPTION

In the event of a planned or unexpected disruption to services or facilities for guests with disabilities (the automatic doors to the premises), Club Italia will notify affected guests promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. The notice will be placed in the entrance ways to the Banquet facility and at the outdoor facilities on the property.

7. MODIFICATIONS TO THIS OR OTHER POLICIES

Changes will not be made to this Plan unless the impact of the changes on persons with disabilities has been considered.

Any policy of Club Italia that does not respect and promote the dignity and independence of people with disabilities will be modified or removed. We have reviewed our current policies and are satisfied that no such modification or removal is required at the present time.

For more information or to provide feedback with respect to Club Italia's accessibility policies, please contact the General Manager of Club Italia

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