

John G. Cooke & Associates Ltd.
Accessibility for Ontarians with Disability Act (AODA)
Accessibility Policy

Last Revision: 17-Jan-2025

This policy is consistent with the Accessibility Standards for Customer Service (Customer Service Standard) and the Integrated Accessibility Standards, both made under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

Definitions

For the purposes of this policy John G. Cooke & Associates Ltd. uses the following definitions which are based on terms included in the *Accessibility for Ontarians with Disabilities Act*:

“Accessible Formats” may include, but are not limited to, large print, recorded audio and electronic formats and other formats usable by persons with disabilities.

“Barrier” means anything that prevents a person with a Disability from fully participating in all aspects of society because of his or her Disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

“Communication Supports” may include but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

“Disability” means,

- a) 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,
- b) a condition of mental impairment or a developmental disability, a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- c) a mental disorder, or
- d) 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 physician or nurse confirming that the 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.

Accessibility Standards for Customer Service

Purpose and Commitment

John G. Cooke & Associates Ltd. is committed to maintaining an accessible environment for persons with disabilities in the delivery of its goods or services.

John G. Cooke & Associates Ltd. will use reasonable efforts to ensure that its policies, practices and procedures governing the provision of its goods or services to persons with disabilities are consistent with the following principles:

- goods or 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 customers; and
- persons with disabilities have opportunities equal to those provided to others to obtain, use and benefit from the organization’s goods or services.

When communicating with a person with a disability, staff of John G. Cooke & Associates Ltd. shall do so in a manner that takes into account the person’s disability.

Application

This policy applies to goods or services that are provided externally to the public or third parties.

The policy applies to all staff of John G. Cooke & Associates Ltd.

Providing goods and services to persons with disabilities

John G. Cooke & Associates Ltd. is committed to excellence in serving all clients, 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. John G. Cooke & Associates Ltd.'s office is located on the second floor and does not have an elevator or other means of access other than stairs. Upon arrival in the ground floor lobby, the persons with disabilities are to notify John G. Cooke & associates Ltd. of their arrival by calling 613-226-8718 extension 221.

- serving persons with disabilities who use assistive devices. John G. Cooke & Associates Ltd.'s staff will visit the client at his location.
- ensuring that persons with disabilities who are accompanied by their Guide Dog or other Service Animals are permitted to enter the premises with the animal and to keep the animal with them, unless the animal is excluded by law from the premises. Alternatively, John G. Cooke & Associates Ltd.'s staff can visit the client at their location.
- ensuring that persons with disabilities who are accompanied by a Support Person are permitted to enter the premises with their Support Person and have access to their support while on the premises. Alternatively, John G. Cooke & Associates Ltd.'s staff can visit the client at their location.

Support Persons

Support Persons accompanying people with disabilities are required at John G. Cooke & Associates Ltd. premises, unless deemed not necessary by both parties. In some cases, the presence of a Support Person may be required by John G. Cooke & Associates Ltd. to protect the health and safety of the person with a Disability or others within John G. Cooke & Associates Ltd.'s premises. This requirement would be assessed on a case-by-case basis and would only be required if risks cannot be mitigated by other means.

Service Animals

A person with disabilities may be accompanied by a Guide Dog or other Service Animal when on the John G. Cooke & Associates Ltd.'s premises.

In the event that Service Animals are excluded by law from the premises, John G. Cooke & Associates Ltd. will provide other resources or supports to enable the person with disabilities to access our goods or services. In the event that accommodating this requirement would compromise the health and safety of another person (i.e severe allergy) John G. Cooke & Associates Ltd. will consider all relevant information, factors and options to come up with a solution that meets the needs of both parties.

If it is not apparent that an animal accompanying a person is a Service Animal, John G. Cooke & Associates Ltd. may require the person to produce a letter from a physician or a nurse to confirm that the person requires the Service Animal for reasons relating to their Disability.

Notice of temporary disruption

John G. Cooke & Associates Ltd. will notify the public in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be posted at the entrance to our main Reception, or communicated by such method as is reasonable in the circumstances.

Training for staff

John G. Cooke & Associates Ltd. will ensure that training about the provision of the John G. Cooke & Associates Ltd.'s goods or services to persons with disabilities, as outlined below, is provided to: (i) all staff and other individuals (agents, volunteers or otherwise) who deal with the public or other third parties on the John G. Cooke & Associates Ltd.'s behalf and (ii) any person who participates in developing the Customer Service Standard part of this policy. This training will be provided as soon as practicable after a staff member commences his or her duties and will include the following topics:

- the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standard;
- how to interact and communicate with persons with various types of disabilities;
- how to interact with persons with disabilities who use an assistive device or require the assistance of a Guide Dog, Service Animal or a Support Person;
- how to use or access equipment or devices available on the premises or otherwise provided by John G. Cooke & Associates Ltd. that may help with the provision of goods or services to persons with disabilities;

- what to do if a person with a Disability is having difficulty in accessing our goods or services;
- John G. Cooke & Associates Ltd.'s policies, practices and procedures relating to the Customer Service Standard.

John G. Cooke & Associates Ltd. will provide training on an ongoing basis when changes are made to its policies, practices and procedures governing the provision of goods or services to persons with disabilities.

Integrated Accessibility Standards

Purpose and Commitment

John G. Cooke & Associates Ltd. is committed to meeting our obligations under the *Accessibility for Ontarians with Disabilities Act's* Integrated Accessibility Standards (Regulation 1911/11). The Integrated Accessibility Standards outline our obligations in relation to ensuring that we remove accessibility Barriers in the areas of information and communications, employment and transportation.

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 the accessibility requirements under the AODA.

Requirements

Confidentiality

Personal information concerning an individual's Disability cannot be released without written consent of the individual and must be managed in a manner that is consistent with privacy laws. Where the accommodation process for an individual requires the release of the individual's personal information to a third party (such as an external resource group), John G. Cooke & Associates Ltd. will obtain the individual's consent and the third party, and any person or department delegated by that third party, will be required to ensure that confidentiality of the personal information is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the individual's personal information was disclosed.

Accessibility Plan

John G. Cooke & Associates Ltd. will develop and maintain a multi-year accessibility plan which will outline the John G. Cooke & Associates Ltd.'s strategy to meet its obligations under the Integrated Accessibility Standards. The plan will be reviewed and updated at least once every five years. This plan will be posted on our website.

Training

John G. Cooke & Associates Ltd. will provide training to its employees, volunteers and other staff members on the Integrated Accessibility Standards and the *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees, volunteers and other staff members.

Information and Communication

Accessible formats and communication supports

- John G. Cooke & Associates Ltd. shall provide or arrange for Accessible Formats and Communication Supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs. These supports will be provided at a cost that is no more than the regular cost charged to other persons.
- John G. Cooke & Associates Ltd. will consult with the person making the request to determine the suitability of an accessible format or communication support.
- Accessible websites and web content

Employment

John G. Cooke & Associates Ltd.'s policies and practices are intended to build an inclusive and accessible work environment free from discrimination and harassment.

Feedback process

John G. Cooke & Associates Ltd. will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities and will notify the public about the availability of Accessible Formats and Communications Supports.

Individuals may provide their feedback in person, by telephone, in writing, or in electronic format. Feedback should be directed to John G. Cooke & Associates Ltd., 17 Fitzgerald Road, Suite 200, Ottawa, Ontario, K2H 9G1 - mailbox@jgcooke.com - 613-226-8718

Complaints may be made in writing as noted above. A representative of John G. Cooke & Associates Ltd. will acknowledge receipt of feedback and complaints within three (3) business days of receipt. A response will be provided within ten (10) business days of receipt. Replies will be provided in the format requested by the client.

Questions about this policy

If anyone has a question about the policy, or if the purpose of the policy is not understood, please John G. Cooke & Associates Ltd., 17 Fitzgerald Road, Suite 200, Ottawa, Ontario, K2H 9G1 - mailbox@jgcooke.com.

Modifications to this or other policies

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

Any OPA policy that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

Maintenance of documents

John G. Cooke & Associates Ltd. will maintain documents describing its policies and procedures and, upon request, shall provide a copy of this document to any person in a format that takes into account that person's disabilities.