

HSPP #28 ACCESSIBILITY POLICY (AODA)



Next Slide

GENERAL

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is Provincial Legislation with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.

Ontario Regulation 429/07 entitled "Accessibility Standards for Customer Service" came into force on January 1, 2008 and applies to all employers with a staff of twenty or more employees, as of January 1, 2012. This regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or other third parties.

PURPOSE AND SCOPE

This policy is in accordance with the Accessibility Standards for Customer Service Ontario Regulation 429/07 and addresses the following:

- The provision of goods and services to persons with disabilities
- The use of assistive devices by persons with disabilities
- The use of service animals by persons with disabilities
- The use of support persons by persons with disabilities
- Notice of temporary disruptions in services and facilities
- Staff training
- Feedback regarding the provision of goods and services to persons with disabilities
- Notice of availability and format of documents

This Policy applies to all Kimco Steel Sales Ltd staff, contractors, service providers, visitors, and guests.

1. OUR MISSION

- The mission of **Kimco Steel Sales Limited** is to always provide excellence service to all customers, contractors, suppliers, and visitors, including people with disabilities in a way that is consistent with the principles of independence, dignity, integration and equal opportunity.

2. OUR COMMITMENT

- In fulfilling our mission, **Kimco Steel Sales Limited** strives at all times to provide its goods and service in a way that respects the dignity and independence of people with disabilities. **We** are also committed to giving people with disabilities the same opportunity to access our Services and allowing them to benefit from the same services, in the same place and in a similar way as other individuals.

2.1 DISABILITY

The definition of a Disability as applicable under the Accessibility for Ontarians with a Disability Act may be found in the Ontario Human Rights Code. This is a condensed definition:

- (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,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*; ("handicap")

Please Note: That unfortunately our offices are not wheelchair assessable at this time. It is however our policy to do our best to provide our services to disable customers by providing access to the premises as far as possible by reasonable accommodation.



2.2 WHEELCHAIR ACCESS

- The necessary infrastructure has been implemented to allow individuals utilizing wheelchairs and other accessibility devices to access KIMCO Steel Sales Limited property. An elevator has been installed providing disabled individuals access to all 3 levels of the office building. The elevator can be accessed from the new office addition at the backside of the building. A disabled parking space has been dedicated at the back of the building to allow the necessary individuals direct access via a concrete path to backside of the building. The necessary accessibility/automatic doors have been installed as well, to provide unassisted access to the office building.
- Any individuals utilizing assistive devices who have business outside and do not require access to the building, will be directed to the Non-Ferrous Warehouse for assistance from a trained worker.
- The scale master or scale attendant will direct individuals with a disability to the necessary areas depending on the services they require. Signs & resources are also in place to direct individuals to the proper areas and assist them.

[Previous Slide](#)[Next Slide](#)

2.3 SECONDARY SITE ACCESSIBILITY

- **Kimco Steel Sales Limited** is committed to excellence in serving all individuals including people with disabilities. KIMCO Steel Sales Limited secondary site located at 1431 McAdoo's Lane has been developed with the necessary infrastructure (Handicap Accessible Parking, walkways & entrances) in place to assist individual with a disability.



[Previous Slide](#)

[Next Slide](#)

2.4 PROVIDING GOODS AND SERVICE TO PEOPLE WITH DISABILITIES

- **Kimco Steel Sales Limited** is committed to excellence in serving all individuals including people with disabilities and we will carry out our functions and responsibilities in the following areas:

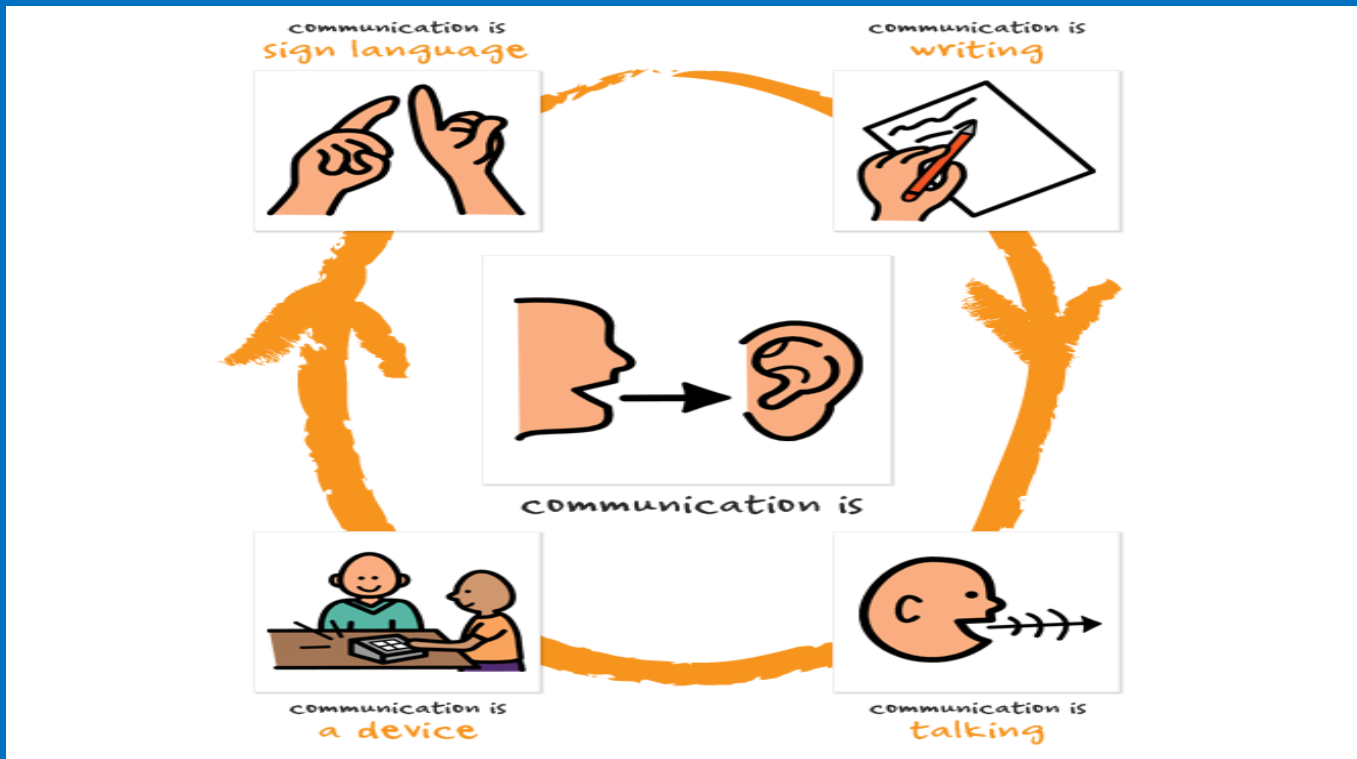


[Previous Slide](#)

[Next Slide](#)

3.1 COMMUNICATION

➤ We will communicate with people with disabilities in ways that take into account their disability.



3.2 TELEPHONE SERVICES

- We are committed to providing fully accessible telephone service to all individuals we deal with. We will train staff to communicate over the telephone in clear and plain language and to speak clearly and slowly, as might be required.
- We will offer to communicate with individuals by e.g. **email, TTY, relay services**, if telephone communication is not suitable to their communication needs or is not available.



[Previous Slide](#)

[Next Slide](#)

3.3 ASSISTIVE DEVICES

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that our staff are trained and familiar with various assistive devices that may be used by individuals with disabilities while accessing the services we provide.

We will also ensure that staff know how to use the assistive devices available on our premises for disabled individuals accessing our facilities.



Previous Slide

Next Slide

ASSISTIVE TECHNOLOGY

3.4 SIGNAGE

We are committed to serving people with disabilities. We will ensure that our staff are trained and familiar with the various methods used to assist individuals with disabilities while accessing the services we provide.

We will also ensure that the necessary signage is present on our premises for disabled individuals accessing our facilities to reference.



3.5 ACCESSIBILITY PARKING

We are committed to serving people with disabilities. We will ensure that the necessary parking spaces and infrastructure are in place to provide individual with disabilities direct and safe access to our business.

We will also ensure that the necessary employees are trained and capable of assist individuals with disability who may need assistance.



4.0 USE OF SERVICE ANIMALS AND SUPPORT PERSONS

We are committed to welcoming 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. We will also ensure that all staff dealing with the public is properly trained in how to interact with people with disabilities who are accompanied by a service animal.



We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter **Kimco Steel Sales Limited** premises with his or her support person. At no time will a person with a disability who is accompanied by a support person to be prevented from having access to his or her support person while on our premises.



[Previous Slide](#)

[Next Slide](#)

4.0 USE OF SERVICE ANIMALS AND SUPPORT PERSONS

If **Kimco Steel Sales Limited** needs to discuss confidential information with a person accompanied by a support person, the person with the disability will be asked if he or she wishes the support person to be present and, if so, to sign a consent form authorizing the **Kimco Steel Sales Limited** to disclose confidential information in the presence of the support person (see Appendix A). In addition, the support person will be asked to sign a confidentiality agreement (see Appendix B) to keep the confidential information disclosed by the **Kimco Steel Sales Limited** in strict confidence.



5.0 NOTICE OF TEMPORARY DISRUPTION

Kimco Steel Sales Limited will provide individuals with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people 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 placed at all public entrances and service counters on our premises.

6.0 TRAINING FOR STAFF

Kimco Steel Sales Limited will provide training to all employees, who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of service policies, practices and procedures. Individuals in the following positions will be trained.

Training will include the following:

- 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 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



6.0 TRAINING FOR STAFF

- How to use the e.g. TTY, wheelchair lifts, etc., available on provider's premises or otherwise that may help with the provision of services to people with disabilities.
- What to do if a person with a disability is having difficulty in accessing **Kimco Steel Sales Limited Services**.
- **Kimco Steel Sales Limited** policies, practices and procedures relating to the customer service standard.

Applicable staff will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

7.0 FEEDBACK PROCESS

The ultimate goal of **Kimco Steel Sales Limited** is to meet and surpass expectations while serving individuals with disabilities. Comments on our services regarding how well those expectations are being met are welcomed and appreciated.

Feedback regarding the way **Kimco Steel Sales Limited** provides services to people with disabilities can be made by e-mail, verbally/in-person, suggestion box, feedback card and telephone. All feedback will be directed to Kimco management, or to the Safety Officer, Melvin Skeete. Individuals can expect to hear back within **Ten Working Days**

8.0 MODIFICATIONS TO THIS OR OTHER POLICIES

We are committed to developing disability service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of **Kimco Steel Sales Limited** that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.



9.0 EMERGENCY NOTIFICATION

When an employee disclose a disability that may impair their ability to respond to an emergency situation, Kimco Steel Sales Limited will work with the Employee to develop a documented plan to remove barriers for their safe exit/response to probable incidents. The Employee is required to notify Human Resources of changes that require these plans to be upgraded.

10.0 SELF-SERVICE KIOSKS

When Kimco Steel Sales Limited implements interactive electronic terminals (Self-Service Kiosks) for public and third parties use, the design and implementation will consider persons with disabilities.

11.0 ACCOMMODATING EMPLOYEES AND JOB RECRUITMENT

BY JANUARY 1, 2016

Advertising for jobs will include a statement regarding availability of accommodation for applicants with disabilities in the recruitment process.

When applicants are selected to participate in an assessment or selection process or when given offers of employment, the applicant shall be notified that accommodations are available upon request in relation to the materials or processes to be used.

[Previous Slide](#)

[Next Slide](#)

12.0 ACCESSIBILITY PLANNING

BY JANUARY 1, 2016

- In accordance with AODA Regulations, accessibility planning will be developed, implemented and documented to ensure the removal of barriers to promote the accessibility for the disabled.
- This plan will be posted on the internal website as well as the external public and third parties facing website as required. The Plan will be reviewed and updated every 3 years or as required by regulations. This plan can be requested in alternate formats.
- Individual Employees who require accessible formats or communication support will be accommodated to the extent practicable upon request.

13.0 RETURN TO WORK PROCESS BY JANUARY 1, 2016

- **Kimco Steel Sales Limited** will develop and have in place a documented return to work process for its Employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.
- The return to work process will outline the process to facilitate the return to work and will include documented individual accommodation plans as part of the process as required.
- This return to work process will supplement other processes created by or under other statutes (e.g., the Ontario Workplace Safety Insurance Act, 1997).

14.0 PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT /ADVANCEMENT & REDEPLOYMENT

- By January 2016, Kimco Steel Sales Limited will take into account the accessibility needs of Employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to Employees, or when redeploying Employees.

15.0 PUBLIC SPACES

- For those limited areas that are intended for public access, Kimco Steel Sales Limited will consider accessibility requirements when making new areas or major renovations to existing areas. These spaces can include accessible parking, outdoor paths, ramps, stairs, outdoor public eating areas, and service related elements such as service counters.

16. QUESTIONS ABOUT THIS POLICY

This policy exists to achieve service excellence to individuals with disabilities.

If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, Safety Officer of **Kimco Steel Sales Ltd**, Melvin Skeete.

Location of Customer Service Policy

Mandatory Requirements:

- Provide notice that documents are available outlining accessible service policies
- Post notice in an appropriate, conspicuous place
- Kimco Steel Sales Website

APPENDIX A: CONSENT FOR PRESENCE OF SUPPORT PERSON

I _____ consent to _____ being present
Name of applicant/member with disability Name of support person

During my meeting with staff/representative(s) of Kimco Steel Sales Limited on (date) _____

and to the sharing of confidential and/or personal information in the presence of

Name of support person

Signed this _____ day of _____ 20 _____

Kimco Steel Sales Limited Representative

Member/Applicant

[Previous Slide](#)

[Next Slide](#)

APPENDIX B: DECLARATION OF CONFIDENTIALITY

I _____ have been asked to accompany _____
Name of support person *Name of member/applicant*

as a support person. I understand and agree at all times to treat information discussed by staff / representative of Kimco Steel Sales Ltd and _____ for whom I am a
Name of member/applicant
support person as confidential and agree to safe guard the confidentiality of all information shared.

Signed this _____ day of _____ 20 _____

Kimco Steel Sales Limited Representative

Member/Applicant

Previous Slide

Next Slide

APPENDIX C: TRAINING RECORDS

I have received training about the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), the Accessibility for Customer Service, Ontario Regulation 429/07, on how to communicate and interact with people with disabilities and best practices for providing accessible customer service to people with disabilities. This training was provided in the following format:

1. Resource Book
2. Training Workshop
3. Video
4. Other: (Specify): _____

Appendix B: Declaration of Confidentiality

Name

Position

Date

Signature

Action	Timeline
Reviewed	August 6, 2014
Revised	August 6, 2014 (Review/Revise Date Added)
Revised	December 17, 2015 (#9 Emergency Notification, #10 Self-Service Kiosks, #11 Accommodating Employees & Job recruitment, #12 Accessibility planning, #13 Return to Work, Performance Management, #14 Career Development & Advancement & Redevelopment & # 15 Public Spaces added)
Reviewed	November 30, 2016 (no Change)
Reviewed	February 24, 2017 (no change)
Reviewed	March 13, 2018 (no change)
Reviewed	March 31, 2020 (No change) by Jamie Conner Safety Assistant
Revised & Reviewed	March 1, 2021 (2.1 Disability Definition Updated) by Brock Badgley, Safety Assistant
Revised & Reviewed	November 14, 2023 (2.2 Wheelchair Access & 2.4 Updated, 3.4 Signage 3.5 Accessibility Parking Added, Authorization Changed)

Authorized by:

CR

Cody Rosen, President

[Previous Slide](#)

[The End, Thank You!](#)