

Accessibility Plan for Brydson Group Ltd.

STATEMENT OF COMMITMENT

The Brydson Group Ltd. (Elmwood Spa, a division of Brydson Group Ltd., elmspa, Terrace Restaurant & Bangkok Garden Company (“The Company”) is committed to accommodating a barrier-free environment for our guests, employees, job applicants, suppliers, visitors, and other stakeholders who enter our premises or access our information. As an organization, we respect and endeavor to uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and the Integrated Accessibility Standards Regulation for Information and Communications, Employment, and Transportation, and eventually, for the Built Environment.

This plan will outline the strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill the company’s commitment as outlined in the Accessibility Policy.

In accordance with the requirements set out in the IASR, the company will:

- Establish, review and update this plan in consultation with persons of disabilities.
- Post this plan on our website (www.elmwoodspa.com; www.bangkokgarden.ca; www.elmspa.ca)
- Report as required on our website on the progress of the implementation of this plan.
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

OVERVIEW

- Accessibility Standards for Customer Service
- Design of Public Spaces Standards (Accessibility for the Built Environments)
- Training
- Employment Standards
 - Recruitment
 - Recruitment General, Assessment and Selection
 - Notice to Successful Applicants
 - Documented Individual Accommodation Plans/ Return to Work Process
 - Performance Management, Career Development and Deployment
- Workplace Emergency Response Information
- Information and Communication Standards
 - Accessible Websites and Web Content
 - Feedback, Accessible Formats and Communication Supports

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Commitment:

Our policy outlines our commitment to providing access to our business and delivering excellent services at all times in a way that respects the dignity and independence of all of our guest and visitors.

Actions Taken:

- Developed Accessible Customer Service Policy which is available on our website.
- All employees are trained and familiar with various assistive devices.
- A statement confirming that our organization has remained in compliance with the Customer Services Standard.
- How customer feedback can be submitted through the website, by email, phone or in-person

- Alternate format request form
- All training is tracked and recorded.
- A refresher course has been developed and delivered to all current staff. All new staff are required to participate in AODA Customer Service Training on their first day of employment with the company.
- We have added AODA to our websites so that guests can access our materials and policies.
- Ensuring guests accompanied by a guide dog or other service animal in areas of the business open to the public are accommodated.
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated.
- Reporting compliance with the Customer Service Standards as required.

Required legislative compliance: January 1, 2012.
Completed/ongoing.

DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY FOR THE BUILT ENVIRONMENTS)

Commitment:

The Company is committed to designing public spaces that are free from barriers and accessible to all persons we take care of while undertaking new construction or planned significant alterations.

Action Taken:

In accordance with the IASR, The Company implemented the following:

- We shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) when undertaking new construction or planned significant alterations of public spaces.

Required legislative compliance: January 1, 2016.
Ongoing

TRAINING

Commitment:

- To train all employees on applicable IASR requirements and the organizations responsibilities under the Human Rights Code as it pertains to persons with disabilities.

Action Taken:

- Training for all new employees will delivered during orientation and all applicable content is covered.
 - Understanding Human Rights and IASR-Information/Communication and Employment (AODA edition)
- Retraining employees on any new information that has developed.
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.
- Keep and maintain a record of any training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

Required legislative compliance: January 1, 2014, and ongoing.
Completed/Ongoing

EMPLOYMENT STANDARDS

Recruitment

Commitment:

We are committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

Action Taken:

Started to implement the measures below as of January 2014.

Recruitment General, Assessment and Selection

Notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment
- Specifying that accommodation is available for applicants with disabilities, on our Careers page and on job postings.
- Whenever needed work with suppliers to ensure any external web pages are compliant with the Information and Communication Standards under the IASR's requirements.
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, we will notify the successful applicant of its policies for accommodating employees with disabilities. This includes:

- Review and, as necessary, modify existing recruitment policies, procedures and processes.
- Any accommodation requests pertaining to the company's selection/assessment methods that cannot be met with current alternate formats will be forwarded to HR who will work with the individual to develop an acceptable alternative.

Required legislative Compliance: January 1, 2016

Completed/Ongoing review

DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS/ RETURN TO WORK PROCESS

Commitment:

- We will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and policies surrounding accommodation and return to work are followed, where applicable

Action Taken:

- Our policies include steps that the Company will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to a disability.
- We have included steps for what to include in the process and plan.
- The content of the accommodation plan will be restricted to only those required to facilitate the plan or supervise the employee. The accommodation plan form will include a section identifying the individuals that will have knowledge of the plan and will require each person to sign an acknowledgement of the confidentiality of its contents.
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied.
- The means of providing the individual accommodation plan in a format that considers the employee's accessibility needs due to a disability.
 - Accommodation plan documents will be made available in accessible formats if applicable.
 - Information that is needed in order to perform the employee's job; and
- Identify and other accommodation that is to be provided to the employee.

Required legislative Compliance: January 1, 2016

Completed/Ongoing review

PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND DEPLOYMENT

Commitment:

- Ensure the organizations performance management and career development opportunities account for the accessibility needs and plans of employees and that these processes are inclusive and barrier free.
- Consider the accessibility needs and accommodation plans of employees who are reassigned to an alternate department or position with the company as an alternative to a layoff.

Action Taken:

- Reviews, assesses and, as necessary, modifies existing policies, procedures and practices to ensure compliance with IASR.
- Takes the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when doing the following with employees with disabilities.
 - Assessing performance
 - Providing career development and advancement
 - Redeploying.

Required legislative Compliance: January 1, 2016

Completed/Ongoing review

WORKPLACE EMERGENCY RESPONSE INFORMATION

Commitment:

Where the company is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

Action Plan:

- Individualized workplace emergency response information procedures will be developed for employees with disabilities, as required.
- Where required, the Company will provide assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster.
- When these plans have been put in place they will be communicated to employees' respective managers and Health and Safety Committee, on an "as needed" basis.
- On an ongoing and regular basis and as per the applicable terms of the IASR, the Company will review and assess general workplace emergency response procedures and any individualized emergency plans to ensure that all accessibility issues of any are addressed.

Ongoing based on employee needs

INFORMATION AND COMMUNICATION STANDARDS

Accessible Websites and Web Content

Commitment:

- Ensure website and web content published after January 1, 2012, conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0. level A.
- AODA compliance should be included as one of the criteria in selecting technology vendors for new website and development initiatives.

Planned Action:

- The Company is fully aware of WCAG requirements and will continue to ensure all new content and/or any substantial refreshes to the site conform to established guidelines.

Required legislative compliance: January 1, 2014.
Ongoing review

Feedback, Accessible Formats and Communication Supports

Commitment:

- Upon request, provide accessible formats and communication supports to individuals with disabilities.
- Where a communication support or accessible format cannot be provided immediately, consult with the guest, or arrange for a suitable format as soon as possible.
- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports, upon request and in a timely manner.

Action Taken:

- We have created an AODA – Alternate Format Request Form for staff to give to clients so that we can respond to their accessible feedback requests.
- Consult with the person making the request to determine the suitability of the accessible format or communication support.
- Training has been provided to employees on how to receive and respond to accessible feedback requests.

Required legislative Compliance: January 1, 2015, and January 1, 2016.
Completed/Ongoing review

Revision Control

Date	Comments
August 2014	Created
January 2015	Plans reviewed and revised
January 2016/2017	Changes made to reflect updates
April – May 2021	Updated the plan to make it more details and timelines