

Accommodation & Accessibility Policy

Intent

Boxhub is committed to providing equal treatment with respect to employment without discrimination because of age, race, ancestry, citizenship, ethnic origin, place of origin, creed, disability, family status, marital status, gender identify, gender expression, sex, and sexual orientation as described by the Ontario *Human Rights Code* (the Code).

Boxhub has adopted this policy to ensure that our staff are provided with meaningful employment that is ethical and fair, and is in compliance with all applicable employment, and human rights legislation.

Principles

The approach taken by Boxhub in the provision of reasonable accommodation shall include:

- Personalized plans designed to meet the specific needs of individuals.
- Collaborative practices in the creation and implementation of accommodation plans through consultation with all relevant stakeholders, the person to be accommodated, and medical professionals.
- An approach that ensures respect, confidentiality and dignity.

Guidelines

Boxhub will support the accommodation of employees and job applicants who require workplace accommodation under any of the grounds described in the Code.

Boxhub will work to achieve a workplace free of barriers by providing accommodation for the needs of those individuals covered by the Code, up to the point where it causes undue hardship for Boxhub. Every effort will be made such that the impact of accommodation will not discriminate against another group protected by the Code.

Commitment to Accommodation

Boxhub will work to ensure that individuals protected under the Code are able to work effectively, by making adjustments or modifications to the work, or the work environment, up to the point of undue hardship.

Boxhub will work with the individual who requests accommodation in an effort to ensure that the measures taken are both effective and reasonable. Boxhub encourages individuals to submit requests for accommodation or to request accommodation during the recruitment process.

Accommodation may be casual, short term, temporary, or long term, based on the requirements of the individual.

Financing the Accommodation

Where the accommodation required necessitates an investment in materials, equipment or increased budget for the position, requests for financing must be directed to the Head of People & Culture.

Accommodating Job Applicants

Boxhub will meet all legislative requirements in providing accommodation to job applicants as well as employees.

Any applicant to Boxhub who communicates the need for accommodation shall be considered in a manner that is non-discriminatory, and respectful of our human rights obligations.

Undue Hardship

Boxhub shall work to provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would cause excessive costs that create undue hardship for the organization, or where the accommodation would create a health and safety hazard.

Procedures

Requesting Accommodation

Employees requesting accommodation must complete a Reasonable Request Accommodation Request. It is important to complete the form in full in order to support management in understanding your request. Once you have completed the form it must be submitted to the Head of People & Culture.

Accommodation Process

1. Management will review and assess each Request for Accommodation within 2 weeks.
2. Management will meet with the requester to review the request and discuss accommodation.
3. After the meeting with the requester, management will either notify the requester that the request was approved and accommodation planning will start or that the request was denied.
4. Management will work to ensure that all requests are considered and responded to within a reasonable timeframe; however, because each request is unique, timeframes will vary based on complexity and the work environment.
5. Depending on the request, management might implement a short term solution to allow for proper time to work through the request.
6. Requests for accommodation will be considered based on the information provided and the perceived barriers presented.
7. Management will consider the request, as well as the workplace, to determine the possibility of solutions.
8. Management will have meetings with all required stakeholders, including the requester.
9. Once management has considered the request and possible solutions, an accommodation plan and the Employer Response Form will be presented to the requester.
10. The requester will either agree to the plan presented or refuse the plan.
11. If the requester agrees to the plan, management will work with the requester to set up timeframes for implementing and reviewing the plan.
12. All approved accommodation plans are considered temporary and do not constitute a permanent change in job duties, responsibilities, working hours, or schedules.
13. All approved accommodation plans will require regular reviews and evaluation.

Denial of Accommodation Request

All employees have the option to complete and submit requests for accommodation; however, the request itself does not guarantee that Boxhub will approve the request and work through the accommodation process. Each request is evaluated; however, in the event that management denies a request for accommodation, the requester will be provided with a rationale for the decision.

Refusing Accommodation Plans

Once management has reviewed all of the factors of the request, an accommodation plan will be presented. In the event that the requester doesn't approve or agree with the plan, they can refuse what is presented. At that stage, the requester must inform management as to why they are refusing the plan. If the refusal has merit or presents other factors/barriers that were not considered, management will continue the process of accommodation. If the requester cannot provide a reasonable rationale for the refusal, the accommodation process will cease.

Challenging a Request for Accommodation

In the event that a request of accommodation was denied or the accommodation plan did not meet expectations, the requester can challenge management's decision. To challenge a request for accommodation and its process, the requester must submit their concerns in writing to the Head of People & Culture within 2 weeks. The letter must identify the following:

1. Requester's name
2. A brief outline of the original request for accommodation (i.e., what the requester was hoping for)
3. Outcome of the request for accommodation
4. Rationale or reasoning as to why the outcome wasn't appropriate or agreeable
5. Any additional information that the company should consider
6. What the requester is hoping for as a result

Letters challenging a request for accommodation will be reviewed and considered within 2 weeks. The requester will be notified if management will re-open the original request for accommodation or if the denial or presented plan will remain active.

Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the Accommodation Policy of Boxhub. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy.

Signature

Date



AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

Intent

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Employment Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Boxhub shall follow the principles of dignity, independence, integration and equal opportunity.

Definitions

Accessible Formats: Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communication Supports: Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Performance Management: Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

General Principles

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

A. General Requirements

General requirements that apply across all of the three (3) standards (information and communication, employment and customer service) are outlined as follows.

Establishment of Accessibility Policies and Plans

Boxhub will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Training Requirements

Boxhub will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Boxhub's policies, and all other persons who provide goods, services or facilities on behalf of Boxhub.

Training will be provided as soon as is reasonably practicable, but no later than December 22, 2023. Training will be provided on an ongoing basis to new employees and as changes to Boxhub's accessibility policies occur.



B. Recruitment, Assessment and Selection

Boxhub will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Boxhub will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Boxhub's policies and supports for accommodating people with disabilities.

C. Accessible Formats and Communication Supports for Employees

Boxhub will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Boxhub will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Boxhub will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

D. Workplace Emergency Response Information

Where required, Boxhub will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee's overall accommodation needs or plans are reviewed; and/or
- Boxhub reviews general emergency response policies.

E. Performance Management and Career Development and Advancement

Boxhub will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

F. Review

This policy will be reviewed regularly to ensure that it is reflective of Boxhub's current practices as well as legislative requirements.



Acknowledgment and Agreement

I, _____, acknowledge that I have read and understand the AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy of Boxhub. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy.

Signature

Date



AODA - Integrated Accessibility Standards Regulations (ISAR) Customer Service Policy

Intent

All goods and services provided by Boxhub will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation* under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

Definitions

Assistive device: A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

Disability: As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 coordination, blindness or visual impediment, deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- 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: A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety, and increased independence for people who are blind.

Service animal: A service animal for a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
 - College of Audiologists and Speech-Language Pathologists of Ontario;
 - College of Chiropractors of Ontario;
 - College of Nurses of Ontario;
 - College of Occupational Therapists of Ontario;
 - College of Optometrists of Ontario;
 - College of Physicians and Surgeons of Ontario;
 - College of Physiotherapists of Ontario;
 - College of Psychologists of Ontario; or
 - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support person: In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

Guidelines

The Provision of Goods and Services to Persons with Disabilities

Boxhub will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a health and safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual accommodation needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

Guide Dogs and Service Animals

A customer with a disability who is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals.

Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

Recognizing a Guide Dog or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, Boxhub may request verification from the customer.

Care and Control of the Animal:

The customer who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Boxhub will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Human Rights Code* and the, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyse all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

Notice of Disruptions in Service

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Boxhub. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur, Boxhub will provide notice by:

- Posting on the company website; or
- By any other method that may be reasonable under the circumstances.

Customer Feedback

Boxhub shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers (employees) and notice of the process will be made available by slack. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered or e-mail), will be available upon request.

Submitting Feedback

Customers can submit feedback to:

Employee name and position title
Phone number
Mailing address
E-mail address

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Boxhub employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Training

Training will be provided to:

- Every employee of or a volunteer with Boxhub;
- Every person who participates in developing the policies of Boxhub; and
- Every other person who provides goods, services, or facilities on behalf of Boxhub.

Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- A review of the requirements of the customer service standards;
- Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog or other service animal; or
 - Require the use of a support person;
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

Boxhub will provide training as soon as practicable. Training will be provided to new employees during onboarding. Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to company procedures.

Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the AODA – Integrated Accessibility Standards Regular (IASR) Customer Service Standards Policy of Boxhub. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy.

Signature

Date