
Niagara Casinos Policy

Title: AODA Integrated Accessibility Standards

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PURPOSE

The Integrated Accessibility Standards (Regulation 191/11) under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) came into force on July 1, 2011. The regulation establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment, and transportation. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario Human Rights Code.

The purpose of this policy is to ensure that Niagara Casinos complies with the Government of Ontario's integrated accessibility standards.

APPLICATION AND SCOPE

This policy applies to all Niagara Casinos associates.

POLICY STATEMENT

Niagara Casinos is committed to creating an inclusive culture across the organization by preventing and removing barriers for persons with disabilities. Where it is not possible to remove barriers, Niagara Casinos will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner.

Niagara Casinos supports the principles of the AODA and the Integrated Accessibility Standards Regulation.

As a designated large private sector organization, Niagara Casinos' goal is to ensure accessibility for our employees and the public we serve.

DEFINITIONS

Barrier: anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

Standard: the AODA sets out what a person or organization must do to achieve accessibility for persons with disabilities to whom the standard applies.

Large designated private sector organization: a designated private sector organization with 50 or more employees, such as Niagara Casinos.

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.

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

Feedback: any comments, compliments, suggestions or complaints provided to Niagara Casinos by its customers.

Disability: according to the *Ontario Human Rights Code*, as referenced by AODA, means:

- i. 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
- ii. a condition of mental impairment or a developmental disability
- iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- iv. a mental disorder
- v. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

(Disabilities may differ in severity, may be visible, invisible, and have effects which may come and go).

Internet website: means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier and is accessible to the public.

New internet website: means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Information: includes data, facts and knowledge that exists in any format, including text, audio, digital or images.

Kiosk: means an interactive electronic terminal, including a point of sale device, intended for public use.

REQUIREMENTS

1. Confidentiality of Information

Personal information concerning an individual's disability cannot be released without consent of the individual and must be managed in a manner that is consistent with *Personal Information Protection and Electronic Documents Act, (PIPEDA)*, where appropriate. Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party, and any person or department delegated by that third party, will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required.

2. Accessibility policies

Through this AODA Integrated Accessibility Standards policy and related accessibility policies, Niagara Casinos confirms our commitment to meet the needs of persons with disabilities in a timely manner.

Niagara Casinos will make these documents publicly available and provide them in an accessible format upon request.

3. Accessibility plans

- 3.1. Niagara Casinos will maintain a multi-year accessibility plan and review and update it once every five years.
- 3.2. Niagara Casinos will post the plan on its website and provide it in accessible format upon request.
- 3.3. Niagara Casinos will file an annual status report on the progress of measures taken to implement its strategy, post the report on its website and provide it in accessible format upon request.

4. Self-service kiosks

Niagara Casinos will consider incorporating accessibility features when designing, procuring or acquiring self-service kiosks, except where not practicable to do so.

5. Training

Niagara Casinos will provide training to employees on the requirements of accessibility standards and on the *Ontario Human Rights Code* as it pertains to persons with disabilities.

6. Information and Communications

6.1. Feedback

Niagara Casinos 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.

6.2. Accessible formats and communication supports

- i. Niagara Casinos 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.
- ii. Niagara Casinos will consult with the person making the request to determine the suitability of an accessible format or communication support.
- iii. Communications supports will be provided at a cost that is no more than the regular cost charged to other persons.

6.3. Accessible websites and web content

Niagara Casinos will make its internet websites and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, except where not practicable to do so.

7. Employment

Niagara Casinos' policies and practices are intended to build an inclusive and accessible work environment free from discrimination and harassment.

RELATED POLICIES AND PROCEDURES

- Accessibility Standards for Customer Service Policy

REFERENCES AND FORMS

- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act, 2005
- Integrated Accessibility Standards Regulation 191/11