
Accessibility Standards for Ontarians with Disabilities Policy

Responsibility: Director, Human Resources

Effective Date: January 1, 2012

Revision Date: January 15, 2023

PURPOSE

Americana Resort Inc. is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Americana Resort Inc. is committed to complying with both the *Ontario Human Rights Code* and the *AODA*. Americana Resort Inc. is committed to excellence in serving all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

DEFINITIONS

Accommodation: Assistance provided to Guests with disabilities so they can participate in the experiences available to all Guests. Accommodation will vary depending on the Guest's unique needs.

Assistive Devices: A technical aid, communication device or medical aid that is used to increase, maintain or improve the functional abilities of Guests with disabilities. Examples include wheelchairs, walkers and/or oxygen tanks.

Disability

- 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,
- 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 symbols, or spoken language,
- A mental disorder, or
- An injury or disability for which benefits were claimed or received under the Workplace Safety and Insurance Act 1997.

Service Animal: Any animal used by a Guest with a disability for reasons relating to the disability where it is readily apparent that the animal is used by the Guest for reasons relating to his/her disability; or where the Guest provides a letter from a physician or nurse confirming that the Guest requires the animal for reasons relating to the disability; or where the Guest provides a valid verification card from a recognized guide dog or service animal training school.

Support Person: A person who accompanies a Guest with a disability in order to assist him/her with communication, mobility, personal care or medical needs or with access to goods or services.

ASSISTIVE DEVICES

Guests with disabilities may require certain accommodations to help them access the goods and services provided by the Americana Resort Inc. These accommodations may involve various forms of assistance, assistive devices or services and may include a Guests' assistive device or one provided by the Americana Resort Inc.

We will ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

Available Assistive Devices and Guest Rooms

- Wheelchair
- Wheelchair ramp
- Guest Rooms, 178, 179, 310, 311, 319, 326

Accommodation Requests

- In situations where it is evident that the Guest has a disability and there is a potential need for accommodation, a Team Member may ask the Guest if they require assistance accessing the Americana Resort Inc.'s goods and services.
- Team Member will approach the Guest with a disability and discuss their accommodation needs with an understanding of the need to respect their privacy regarding their disability and accommodation request.
- If an accommodation cannot be provided immediately, or if an accommodation involves advance scheduling or preparation, Department Manager will;
 - Complete an Accommodation Request Form for Guests with Disabilities.
 - Review the request based on the criteria as outlined in *2.3 Considerations for Determining Accommodation Requests*.
 - Approve or deny the request. If the request is denied, reasonable efforts will be made to provide an alternate accommodation.
 - If the request is approved, the Department Manager will;
 - Locate the service and/or device
 - Inform the Guest of the status of their request

Considerations for Determining Accommodation Requests

When determining the most appropriate form of accommodation, the Americana Resort Inc. will consider the following;

¹Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

- Team Member will approach the Guest with a disability and discuss their accommodation needs with an understanding of the need to respect their privacy regarding their disability and accommodation the cost of the accommodation.
- The likelihood that the accommodation will pose a risk to the health and safety of other Guests.
- If an assistive device is suggested, the overall risk to the Guest, to others, or to the Americana Resort Inc. will be assessed.

Safe Operation of Assistive Devices

It is the responsibility of the person with a disability to ensure that his/her assistive device is operated in a safe and controlled manner at all times when accessing the Americana Resort Inc.'s goods and services.

USE OF SERVICE ANIMALS

Guests with disabilities may require the assistance of service animals to help them obtain, use and access goods and services provided by the Americana Resort Inc. Service animals are permitted on the parts of our premises that are open to the public, unless excluded by law.

Identifying Service Animals

Apparent Service Animals;

- The Guest's need for a service animal is obvious,
- The Guest's need for a service animal is known to Team Members,
- The service animal is wearing a service animal vest or harness; or,
- The service animal is observed assisting the Guest.

Documents/Identifying Service Animals

If a Team Member is uncertain whether the animal is a service animal, Team Members may ask the Guest for documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologies 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
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

Addressing Guests with a Service Animal

When approaching a Guest to ask if the animal is required for reasons related to a disability;

¹Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

- Make reasonable effort to ask the Guest in a discreet manner,
- Ask the Guest if the animal is required for reasons relating to a disability, but will not ask for any explanation of the disability or the duties the animal serves; and,
- Be aware that some Guests who require the use of a service animal may not be familiar with the term “service animal” and may require an explanation of the term.

Removal of Service Animals

Guests may be asked to remove their service animal from the Americana Resort Inc.’s premises for any of the following reasons;

- Disruptive Behaviour: A Guest may be asked to remove their service animal if it displays unruly or disruptive behaviour. If the Guest takes effective remedial steps to correct the animal’s behavioural problems, The Americana Resort Inc. may reconsider this decision.
- Damages: A Guest may be asked to remove their service animal if it causes damage to persons or property. Guests are responsible for any damage to persons or property caused by their service animal.

Exclusion of Service Animals

- If the service animal is excluded by another law, we will explain why the animal is excluded and discuss with the Guest another way of providing goods, service or facilities.
- Service animals are prohibited from the following areas:
 - kitchens as stipulated in the Health Protection and Promotion Act, R.R.O.1990, Reg.562, ss.59 and 60 and the Food and Safety and Quality Act, 2011, O. Reg 31/05, s.44

USE OF SUPPORT PERSONS

If a support person accompanies a Guest with a disability, the Americana Resort Inc. will ensure that both persons are entitled to enter the premises together and that the Guest with a disability is not prevented from having access to the support person while on the premises.

Identifying a Support Person

Support persons provide assistance with communication, mobility, personal care, medical needs or with the access to goods and services to a person with a disability and may be a family member, friend or a paid professional. Support persons do not require specialized training or certification and the type of support they provide will depend on the Guests needs.

Confidential Matters

- If a Guests confidential or personal matter is to be addressed, the Americana Resort Inc. may require a statement of permission and/or consent from the Guest allowing the support person to be present.
- In situations where the Guest or the Americana Resort Inc. prefer to deal with matters without the presence of a support person, the Americana Resort Inc. will ensure that the Guest maintains access to their support person while on the Americana Resort Inc.’s premises.
- Where a support person is present and where confidential the Americana Resort Inc.’s matters are being addressed, The Americana Resort Inc. may require the support person to sign an agreement.

⁷Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

NOTICE OF TEMPORARY DISRUPTIONS

Guests with disabilities may rely on certain facilities, services or systems in order to access the Americana Resort Inc.'s goods and services. The Americana Resort Inc. strives to operate its services and facilities without interruption. However, at times disruptions in services and facilities will occur.

Should a temporary disruption in these services or facilities occur, the Americana Resort Inc. will make reasonable efforts to provide notice of these disruptions.

- Temporary disruptions may occur in elevators, automatic door openers, ramps or to services.
- When a temporary disruption occurs in the services or facilities used by Guests with disabilities to access the Americana Resort Inc.'s goods and services, whether planned or unplanned, The Americana Resort Inc. will provide notice of these disruptions to the public.
 - The amount of advanced notice The Americana Resort Inc. receives about a temporary disruption varies, therefore, the amount of advanced notice given to the public may also vary.

Content of Notices

- The goods or services that are disrupted or unavailable,
- The reason for the temporary disruption such as repairs, maintenance, construction, inclement weather unexpected circumstances, etc;
- The expected length of the temporary disruption; and
- Alternate means of accessing the goods and services, if available. For example, an alternative accessible route or entrance.

Format and Placement of Notices

Notices may be provided in print by signage, or electronically by website postings, or by telephone recording; or in certain situations notice may be provided directly to specified Guests; or by other reasonable notice.

- Visual notices may be provided in larger clear print, using contrasting colours between text and background;
- Notices may be placed at entrances, structures and/or departments where temporary disruption occurs.
- Notices may be posted at the site of the temporary service or facility disruption;
- Notices will be posted in obvious places. Reasonable efforts will be taken to ensure an unobstructed view of the notice;
- Notices will be placed where visible to Guests who may be using assistive devices, such as wheelchairs.

Providing Assistance during Temporary Disruption

Guests with disabilities may need assistance accessing the Americana Resort Inc.'s goods and services during a temporary disruption.

- Guests requiring assistance should make themselves known to the Americana Resort Inc. Team Members.
- Team Members should provide reasonable assistance to Guests with primary consideration being given to health and safety of all involved.

FEEDBACK PROCESS

Feedback about the Americana Resort Inc.'s goods and services and the manner in which they are provided to Guests with disabilities are welcomed as they may identify areas that require change and encourage continuous improvements.

- Feedback may be given by telephone, in writing, electronically, in person or through other reasonable methods to the property Front Office Manager.

¹Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

- Should the Americana Resort Inc. receive a complaint, the Front Office Manager or designate will review and respond to such complaints by telephone or electronically, taking into account the persons disability.
- We strive to respond to all feedback within 2 business days of receipt.
- Guests that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.
- Americana Resort Inc. will make sure our feedback process is accessible to people with disabilities by providing or arranging accessible formats and communication supports, on request.

NOTICE OF AVAILABILITY OF DOCUMENTS

- Americana Resort Inc. will notify the public that documents related to accessible customer service, are available upon request through our website.
- Americana Resort Inc. will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to best determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

COMMUNICATION

- Human Resources will communicate the Policy to Team Members through the Company Orientation Program and additionally through Initial Department Training.
- Make emergency or safety information available to the public accessible, upon request.

TRAINING

- Managers/Supervisors will receive training at Management Meetings on policy changes.
- All new Team Members will be provided with training during the Company Orientation Program.
- Customer Service for Guests with Disabilities will form part of the quarterly Health & Safety section of the newsletter for existing Team Members.
- Records of training will be documented and maintained in the Team Members personnel file.
- Training will include:
 - Review the purposes of Accessibility for Ontarians with Disabilities Act and the requirements of the customer service standard;
 - Americana Resort Inc.'s policies related to the customer service standard
 - Instructions on how to interact and communicate with people with various types of disabilities;
 - Instruction on how to interact with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal or a support person;

- Instruction on how to use equipment or devices available on our premises or that you provide otherwise, that may help people with disabilities access our services; and
 - Instruction on what to do if a person with a disability is having difficulty accessing our services.
- Team Members will also be trained when changes are made to our accessible customer service policies.

MODIFICATIONS TO THIS OR OTHER POLICIES

- Any policies of Americana Resort Inc. that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

COMPLIANCE

Human Resources must submit an annual compliance report with the government, reporting online questions for the Accessibility Standards for Customer Service.

AODA Integrated Accessibility Standards

PURPOSE & POLICY STATEMENT

Americana Resort Inc. is committed to creating an inclusive culture across the organization by preventing and removing barriers for persons with disabilities to afford equal opportunities of programs and services.

Where it is not possible to remove barriers, Americana Resort Inc. will make efforts to accommodate persons with disabilities in a timely, effective, and suitable manner.

This policy is intended to meet the requirements of the Integrated Accessibility Standards (IAS), (Regulation 191/11) under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). The regulation establishes standards to address barriers that persons with disabilities face in the areas of *information and communications, employment, and transportation*.

Americana Resort Inc. supports the principles of the AODA and the Integrated Accessibility Standards Regulation.

As a designated large private sector organization, Americana Resort Inc. has a goal is to ensure accessibility for our team members and the customers we serve. The purpose of this policy is to ensure that Americana Resort Inc. complies with the Government of Ontario's integrated accessibility standards.

APPLICATION & SCOPE

This policy applies to Americana Resort Inc. team members, students and volunteers.

PROCEDURE

Americana Resort Inc. will develop policies, procedures and practices which address integration, independence, dignity and equal opportunity, to comply with the legislation requirement prescribed under the Accessibility for Ontarians with Disabilities Act (AODA) 2005, and to promote accessibility.

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

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.

Disability:

- 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 coordination, 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.

Feedback: Any comments, compliments, suggestions, or complaints provided to Americana Resort Inc. Conference Resort & Spa by its customers.

Internet website: 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: 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 and conveys meaning.

Kiosk: An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products.

¹Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

GENERAL REQUIREMENTS

Integrated Accessibility Standards Commitment

Americana Resort Inc. will maintain a multi-year Accessibility Plan outlining its phased strategy to address the current and future requirements of the AODA and the IASR. Americana Resort Inc. will review and update the Accessibility Plan at least once every five (5) years and will post the Accessibility Plan on its website. Upon request, Americana Resort Inc. will provide a copy of the Accessibility Plan in an accessible format.

Accessibility Policies

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

Americana Resort Inc. will make these documents publicly available and provide them in an accessible format upon request.

Accessibility plans

Americana Resort Inc. will maintain a multi-year accessibility plan and review and update it once every five years. Americana Resort Inc. will post the plan on its website and provide it in accessible format upon request.

Americana Resort Inc. 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.

Procuring or acquiring goods, services or facilities

Americana Resort Inc. will incorporate accessibility features and criteria when procuring or acquiring goods, services or facilities, except where it is not practicable to do so. Where it is deemed not practicable to do so, Americana Resort Inc. will provide an explanation upon request.

Self-service kiosks

Americana Resort Inc. will incorporate accessibility features when designing, procuring or acquiring self-service kiosks, except where not practicable to do so. Any current kiosks will be reviewed upon updating or procuring of future self-service kiosks.

Training team members and volunteers

Americana Resort Inc. will provide training to team members and volunteers on the requirements of accessibility standards and on the *Ontario Human Rights Code* as it pertains to persons with disabilities.

INFORMATION AND COMMUNICATION STANDARDS

Customer Feedback

Americana Resort Inc. 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 as soon as practicable, upon request.

¹Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

Accessible Formats and Communication Supports

Upon request, Americana Resort Inc. will 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.

When an accessible format or communication support is requested, Americana Resort Inc. will consult with the person making the request to determine the suitability of an accessible format or communication support. Americana Resort Inc. will endeavor to provide this in a reasonable amount of time and at a cost that is no more than the regular cost charged to other persons.

Accessible Websites and Web Content

Americana Resort Inc. 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.

EMPLOYMENT STANDARDS OVERVIEW

Americana Resort Inc.'s policies and practices are intended to build an inclusive and accessible work environment free from discrimination and harassment.

Recruitment

Americana Resort Inc. will notify its team members and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

Americana Resort Inc. will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request, in relation to the materials or processes to be used in the job assessment or selection process.

If a selected applicant requests an accommodation, Americana Resort Inc. will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, Americana Resort Inc. will notify the successful applicant of its policies for accommodating team members with disabilities.

Informing Employees of Supports

Americana Resort Inc. will continue to inform its team members of its policies (and any updates) used to support team members with disabilities, including policies on the provision of job accommodations that take into account a team members accessibility needs due to disability. This information will be provided to new team members as soon as practicable after commencing employment.

¹Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

Accessible Formats and Communication Supports for Team Members

Upon the request of a team member with a disability, Americana Resort Inc. will consult with the team member to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the team members job, and information that is generally available to other team members. In determining the suitability of an accessible format or communication support, Americana Resort Inc. will consult with the team member making the request.

Workplace Emergency Response Information

Americana Resort Inc. will provide individualized workplace emergency response information to team members who have a disability, if the disability is such that the individualized information is necessary, and if Americana Resort Inc. is made aware of the team members need for accommodation due to the team members disability. Americana Resort Inc. will provide this information as soon as practicable after becoming aware of the team members need for accommodation.

Where the team member requires assistance, Americana Resort Inc. will, with the consent of the team member, provide the workplace emergency response information to the person designated by Americana Resort Inc. to provide assistance to the team member.

Americana Resort Inc. will review the individualized workplace emergency response information developed for the team member when the team member moves to a different department within Americana Resort Inc. when the team members overall accommodations needs or plans are reviewed, and when Americana Resort Inc. reviews its general

Documented Individual Accommodation Plans

Americana Resort Inc. will maintain a written process for the development of documented individual accommodation plans for team members with disabilities. If requested, information regarding accessible formats and communications supports provided will be included in individual accommodation plans. In addition, the accommodation plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Process

Americana Resort Inc. maintains a documented return to work process for its team members who have been absent from work due to a disability and who require disability-related accommodation in order to return to work. The return-to-work process outlines the steps Americana Resort Inc. will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return-to-work process will not replace or override any other return to work process created by or under any other statute (such as the Workplace Safety Insurance Act, 1997).

Performance Management, Career Development and Advancement & Redeployment

Americana Resort Inc. will take into account the accessibility needs of team members with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement opportunities to team members, or when redeploying team members.

¹Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

REPORTING

Americana Resort Inc. will file an accessibility report regarding its compliance with the IASR, annually or at such other times as specified under the AODA. All filed accessibility reports will be made available to the public, upon request.

QUESTIONS

If anyone has a question about this Policy, or if the purpose of the Policy is not understood, an explanation will be provided by contacting us by mail at Americana Resort Inc.

8444 Lundy's Lane

Niagara Falls, ON L2H 1H4

Any personal information provided in the feedback process will be handled in accordance with the Americana Resort Inc. privacy policies.

COMPLIANCE

Compliance with this policy is mandatory and any violations of this policy will be treated seriously and may result disciplinary action, up to and including an unpaid suspension of employment and/or termination of employment, and/or legal action, as applicable depending on the severity of the incident.

References and Forms

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



AMERICANA RESORT INC. MULTI-YEAR AODA COMPLIANCE PLAN

In compliance with the Integrated Accessibility Standards Regulation, AODA

Introduction and Statement of Commitment

The accessibility plan outlines the policies and actions that Americana Resort Inc. will put in place to improve opportunities for people with disabilities. The Americana Resort strives to provide its goods and services in a manner that respects the dignity, independence, integration and equal opportunity of Guests with disabilities. Our commitment is to provide all Guests the same opportunity to access our goods and services and allowing them to benefit from the same service. The Multi-year Accessibility Plan will be reviewed and modified at least every five (5) years to reflect the Americana Resort Inc.'s accomplishments in improving our services for those with disabilities.

PART I - GENERAL				
STANDARD	REGULATION	ACTION	STATUS	COMPLIANCE DEADLINE
Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the Regulation. 3.(2) organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies. 3.(3) organizations shall, (a) prepare one or more written documents describing its policies; and (b) make the documents publicly available, and shall provide them in an accessible format upon request.	Accessibility policy created Policy includes statement of organization commitment Policy to be made available on website or in an accessible format upon request	Complete	January 1, 2014
Accessibility Plans	4.(1) large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years	Develop multi-year accessibility plan Post multi-year accessibility plan on website and review every 5 years	Complete	January 1, 2014
Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of	Training included in onboarding process of all new Team Members	Complete	January 1, 2015

*Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

	<p>the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.</p> <p>7.(2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.</p> <p>7.(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>7.(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p> <p>7.(5) The Government of Ontario, the Legislative Assembly, every designated organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>Included in department specific training for all Team Members</p> <p>All Team Members are required to complete the training upon hire Training will be provided for all Team Members for any changes as required Training records are retained in all Team Member personnel files</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	
PART II – INFORMATION AND COMMUNICATION STANDARDS				
STANDARD	REGULATION	ACTION	STATUS	COMPLIANCE DEADLINE
Feedback	<p>11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.</p> <p>11.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Process for providing feedback developed and included in policy and is available upon request</p> <p>Policy to be made available on website or in an accessible format upon request</p>	<p>Complete</p> <p>Complete</p>	January 1, 2015

⁷Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

Accessible formats and Communication Supports	12.(1) Organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.	Develop a documented process to determine and provide accessible formats and communication supports	Complete	January 1, 2016
	12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	The individual making the request will be consulted with to determine the format	Ongoing	
	12.(3) Every organization shall notify the public about the availability of accessible formats and communication supports.	Policy to be made available on website or in an accessible format upon request	Complete	
Emergency Procedure, Plans or Public Safety Information	13.(1) In addition to its obligations under section 12, if an organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Information will be made available to the public in an accessible format upon request	Complete	January 1, 2012
		Individualized Emergency Response Plans are in place for Team Members with disabilities	Ongoing	
Accessible Websites and Web Content	14.(2) Organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section. 14.(4) Designated organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule: 1. By January 1, 2014, new internet websites and web content on those	Consult with IT team to develop a plan to meet requirements within specified time frame	Complete	January 1, 2014
			Ongoing	June 1, 2021

*Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

	<p>sites must conform with WCAG 2.0 Level A.</p> <p>2. By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than, i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded).</p>			
PART III – EMPLOYMENT STANDARDS				
STANDARD	REGULATION	ACTION	STATUS	COMPLIANCE DEADLINE
Recruitment, General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Statement to be included in all job postings	Complete Ongoing	January 1, 2016
Recruitment, Assessment or Selection Process	<p>23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>23.(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>	<p>Applicants will be advised of the availability of accommodation and will provide upon request</p> <p>The applicant will be consulted with on accommodation supports</p>	<p>Complete Ongoing</p> <p>Complete Ongoing</p>	January 1, 2016
Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Successful applicants will be notified of the Americana's policies for accommodating employees with disabilities	Complete Ongoing	January 1, 2016
Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Policy to be circulated to all Team Members and information included in quarterly newsletter	Complete Ongoing	January 1, 2016

*Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

	<p>25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	<p>Information included in New Team Member Onboarding package upon hire and written employment offer</p> <p>Team Members will be provided with information when a change to policy occurs</p>	<p>Complete Ongoing</p> <p>Complete Ongoing</p>	
Accessible Formats and Communication Supports for Employees	<p>26.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.</p> <p>26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	Team Members will be consulted with when accessible formats are requested taking into account the disability needs of the requesting Team Member	Complete Ongoing	January 1, 2016
Workplace Emergency Response Information	<p>27. (1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p> <p>27.(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>27.(3) Employers shall provide the information required under this section as soon as</p>	<p>Individualized workplace emergency response information has been provided to Team Members with disabilities</p> <p>Assistance will be provided where required and upon request with the Team Member's consent</p> <p>Information will be provided to the Team Member in a timely fashion</p>	<p>Complete Ongoing</p> <p>Complete Ongoing</p> <p>Complete</p>	January 1, 2012

*Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

	<p>practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>27.(4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. 	<p>after the Americana is made aware of the need for accommodation</p> <p>Individualized workplace emergency response information will be reviewed on a regular and ongoing basis and as required</p>	<p>Ongoing</p> <p>Complete Ongoing</p>	
Documented Individual Accommodation Plans	<p>28.(1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>28.(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or 	<p>A written process will be developed and include all applicable required elements</p>	Complete	January 1, 2016

*Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

	<p>other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> <p>28.(3) Individual accommodation plans shall, (a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26; (b) if required, include individualized workplace emergency response information, as described in section 27; and (c) identify any other accommodation that is to be provided.</p>	Individual accommodation plans will include any and all requests for accessible formats and communication supports, individualized workplace emergency response information and any other accommodation to be provided	Complete Ongoing	
Return to Work Process	<p>29.(1) Every employer (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and (b) shall document the process.</p> <p>29.(2) The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and (b) use</p>	Develop a RTW process and communicate to all Team Members	Complete	January 1, 2016

*Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

	documented individual accommodation plans, as described in section 28, as part of the process. 29.(3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.			
Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. 30.(2) In this section, “performance management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success	The accessibility needs of a Team Member with a disability will be taken into account as well as any accommodation plan, if applicable, when conducting performance management reviews	Complete Ongoing	January 1, 2016
Career Development and Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. 31.(2) In this section, “career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit.	The accessibility needs of a Team Member with a disability will be taken into account as well as any accommodation plan, if applicable, when engaging in career development and advancement opportunities	Complete Ongoing	January 1, 2016
Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of	The accessibility needs of a Team Member with a disability will be	Complete Ongoing	January 1, 2016

*Further interpretation of this policy is the responsibility of the Americana Resort Inc. The Americana Resort Inc. reserves the right to develop, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time.

	its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. 32.(2) In this section, “redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.	taken into account as well as any accommodation plan, if applicable, when redeploying a Team Member with a disability		
PART IV – DESIGN OF PUBLIC SPACES STANDARDS				
STANDARD	REGULATION	ACTION	STATUS	COMPLIANCE DEADLINE
New Buildings and Major Renovations	Requires new spaces and buildings, or existing structures that do not need major reconstruction to be accessible for people with disabilities.	Americana Resort Inc. will employ accessibility features contained in AODA Design of Public Spaces Standards to any new or redeveloped structure that falls under the AODA and the Ontario Building Code		January 1, 2016

Date of creation: January 2014

Date of last review and/or revision: June 2021