



THE TORONTO LAWN TENNIS CLUB

ACCESSIBLE CUSTOMER SERVICE POLICY, PRINCIPLES & PRACTICES

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ACCESSIBLE CUSTOMER SERVICE POLICY, PRINCIPLES & PRACTICES

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Statement of Commitment Regarding Persons with Disabilities

It is the Toronto Lawn Tennis Club's (Club) goal to create a community that is inclusive of all persons and treats all members, guests, employees, volunteers, agents and/or contractors in an equitable manner. In creating such a community, the Club aims to foster a climate of understanding and mutual respect for the dignity and worth of all persons.

In working toward this goal, the Club will strive to provide support for, and facilitate the accommodation of individuals with disabilities so that all may share the same level of access to opportunities, participate in the full range of activities that the Club offers and achieve their full potential as members, guests, employees, volunteers, agents and/or contractors of the Club.

The Club will work to eliminate or minimize the adverse effects of barriers, including physical, environmental, attitudinal, communication and technological barriers that may prevent the full participation of individuals with disabilities. The Club will provide the members, guests, employees, volunteers, agents and/or contractors with opportunities for education and access to information regarding disability, as well as the Club's accessibility plan, AODA policies and Emergency plan. At the same time, the Club will endeavor to protect the individuals' privacy, confidentiality and autonomy.

In working toward its goals under this Statement, the Club is committed to acting conscientiously and in keeping with its own policies and existing legislation related to disability.

Scope

All goods, services and employment provided by the Toronto Lawn Tennis Club shall follow the principles of dignity, independence, integration and equal opportunity (Schedule 1).

- a) This policy applies to the provision of goods and services at premises owned and operated by the Club
- b) This policy applies to employees, volunteers, agents and/or contractors with disabilities that act on behalf of the Club

This policy addresses the following:

- The Provision of Goods and Services to and by Persons with Disabilities;
- Accommodation for employees, volunteers, agents and contract workers (hereafter referred to as "Workers") with disabilities;
- Accommodation of workers during entire employment cycle;
- Accommodation Plans for workers with disabilities;
- The Use of Assistive Devices;
- The Use of Guide Dogs and Service Animals;
- The Use of Support Persons;
- Notice of Service Disruptions;
- Customer Feedback;
- Training;
- Notice of Availability and Format of Required Documents.



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Definitions

Assistive Device – is 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 members, guests and workers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability 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 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 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 – is a highly-trained working dog that has been trained at one of the special facilities to provide mobility, safety and increased independence for members or guests who are blind.

Service Animal – an animal is a service animal for a member or guest with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person – a support person means, in relation to a member or guest with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.



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The Provision of Goods and Services to and by Persons with Disabilities

TLTC 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 and workers receive the same value and quality;
- allowing workers with disabilities to perform their job duties at their own pace, using alternative methods if possible and taking into account their individual needs.
- 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 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 as other customers;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's and worker's disability.

Best Practices: Club employees will be encouraged to be pro-active in seeking solutions and removing barriers, as well as alerting all customers to the range of accommodations that are available.

Club Managers in cooperation with HR Manager will work together with workers to develop an Individual Accommodation Plan and/or Return to Work Plan for workers with disabilities.

The term "persons with disabilities" will be the norm, and if a specific condition must be referenced, the condition will be referenced last (e.g., person with low vision). The following are some general tips that may help make communication and interaction with or about people with all types of disabilities more successful:

- Remember to put people first. It is proper to say person with a disability, rather than disabled person or the disabled.
- Use the term disability or disabled, not challenged or handicapped or other outdated terms. Outdated terms may convey insensitivity and disrespect to persons with disabilities.
- It is best to wait until an individual describes his or her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and assumptions may be wrong.

When the Club bills for services, it should demonstrate a commitment to providing accessible invoices to all of our customers. This means that invoices should be provided in alternate formats upon request (e.g., hard copy, large print, email) and that staff are prepared to answer questions customers may have about the content of the invoice.



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Accommodation for Workers During Entire Employment Cycle

(Effective January, 2016)

The AODA Employment Standard focuses on the entire employment cycle of an individual from recruitment, hiring, retention and exit in terms of accessibility and accommodation of a disability.

Are You Applying for a Position at the Toronto Lawn Tennis Club?

We will be happy to work with you to ensure that your interview is accessible and accommodation is provided. You can indicate to our HR Manager or a direct supervisor that you require accommodation for an interview due to a disability.

If you are applying for a position at the Toronto Lawn Tennis Club and have questions regarding the Accessibility for Ontarians with Disabilities Act (AODA) Employment Standards or accessible employment at the Club, please contact:

- **Katerine Malashenko**, HR Manager kmalashenko@torontolawn.com 416-922-1105 (229)
- **Or visit us** at Toronto Lawn Tennis Club 44 Price St, Toronto, Ontario

Accommodation plans for persons with Disabilities

The HR Manager in cooperation with other Club Managers will develop a Multi-Year Accommodation Plan for members, guests, and workers with disabilities.

If you are an employee who requires an Individual Accommodation Plan while working at the Club due to your disability, please contact our HR manager, Katerine Malashenko, and/or your direct supervisor to ensure that the appropriate accommodation plan is developed. Accommodation Guidelines may provide the workers with an understanding of how the Club addresses accommodation for persons with disabilities.

The Club will also develop a Return to Work Process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work.

The accessibility needs of employees with disabilities will be considered and met during their performance management, performance evaluation and redeployment.



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Accommodation Guidelines

The guidelines are intended to provide the reader with an understanding of how the Toronto Lawn Tennis Club addresses accommodation for people with disabilities in the workplace. Because of the need to respond with some flexibility to individual cases, it should be noted that there may be variations in the way these guidelines apply in individual cases. Individuals should contact their Supervisor or HR Manager for specific issues, questions or requests.

- 1. Request for Accommodation:** Employees may request an accommodation at any time. Accommodation requests usually begin when an employee notifies the HR Manager or their Supervisor, that due to illness or disability, s/he can not perform the essential duties of her/his job.
- 2. Medical Documentation:** The request for accommodation must be supported by medical documentation. An accommodation plan will not be put in place until the Club has received medical information confirming that the employee has a disability and the restrictions and limitations that need to be accommodated. The medical documentation should be submitted to the HR Manager or your Supervisor and treated with appropriate confidentiality. It should include the following information: the start and end date when accommodation is required; employee's functional abilities, limitations and restrictions, the prognosis and the duration of accommodation needed.
- 3. Accommodation Process:** When a request for accommodation is received, your direct Supervisor and HR Manager should be notified so that all involved parties can participate in the accommodation process.

After a request for accommodation has been received, the next step is to ask the employee to provide medical documentation and meet with the employee to discuss his/her accommodation needs. The purpose of the meeting is to review the restrictions and limitations, identify accommodation possibilities, clarify the expected duration of accommodation, identify any non-medical issues that may have an impact on the success of the accommodation, assign responsibilities and determine next steps.

Once the restrictions and limitations are known, the next step is to identify an accommodation plan, which will enable the employee to fulfill the essential duties of his/her job. The parties should develop a written accommodation plan, which must be signed by the Supervisor and Employee and forwarded to the HR Manager.

After this meeting, the parties will follow the steps they discussed in order to put the accommodation plan in place. In some cases, more than one meeting is required before the accommodation is in place and ready for the employee to begin.

- 4. Follow-Up:** Many accommodations, whether in the employee's home position or a different position, require ongoing monitoring and reassessment. HR Manager or Direct Supervisor can request updated medical report on a periodic basis to support ongoing accommodations.



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Assistive Devices

Worker's and/or Customer's own assistive device(s): Persons with disabilities may use their own assistive devices as required when performing their job duties or accessing goods or services provided by the Club.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a worker and/or customer with an oxygen tank may involve ensuring the worker and/or customer is in a location that would be considered safe. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the worker and/or customer.

Best Practices: Every person who deals with members of the public or other third parties will assist with various assistive devices that may be used by members or guests with disabilities.

An Individual Accommodation Plan will be developed for the workers with disabilities to ensure they are assisted with various assistive devices they may require.

Guide Dogs and Service Animals

A customer with a disability that is accompanied by guide dog or service dog 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 and/or service animals. A customer with a disability that is accompanied by guide dog or service animal that is a dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law. Other types of service animals are not permitted into food service areas due to the Health Protection and Promotion Act.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

If a guide dog or service animal is excluded by law, the Club will try to offer alternative methods to enable the person with a disability to access goods and services, when possible.

Recognizing a Guide Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, the Club may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal: The member or guest that is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all time.



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Allergies

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, the Toronto Lawn Tennis Club will make all reasonable efforts to meet the needs of all individuals.

Best Practices: Staff will be prepared to respond to requests of water for the service animal and to show the owner an outdoor area where the animal can be taken to relieve itself.

Support Persons: If a member / guest with a disability is accompanied by a support person, the Club will ensure that both persons are allowed to enter the premises together and that the member / guest is not prevented from having access to the support person.

There may be times where seating and availability prevent the member/guest and support person from sitting beside each other. In these situations the Club will make every reasonable attempt to resolve the issue.

Training

Training will be provided to all workers that act on behalf of the Club; Revised training will be provided in the event of changes to legislation, procedures and/or practices. The Club will keep a record of training that includes the dates when training was provided and the names and number of employees who attended the training.

The training will include information on the purposes of the AODA, requirements of this Regulation, IASR requirements, Human Rights legislation related to disability, how to communicate and interact with people with disabilities, how to interact with service animal or support person, how to utilize assisted devices that are available at our premises, what to do if a person has difficulty accessing the Club, our policies, procedures and practices pertaining to making the Club accessible for people with disabilities.

Best Practices: Wherever possible, face to face training should be undertaken, since it may be more effective in helping staff and others perform their job duties and practice the type of customer service emulated by the regulation.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Club. In the event of any temporary disruptions to facilities or services that customers and workers with disabilities rely on to access or use the Club, 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.

Best Practices: Any service disruption will take top priority and Club employees will check to ensure no one is tapped or stuck because of the disruption.

The notice should include statement of regret and include date.



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Notice of Availability

The Club shall notify customers and workers that the documents related to the AODA are available upon request and in a format that takes into account their disability. Notification will be given by posting the information in a conspicuous place owned and operated by the Club, the Club's website and/or any other reasonable method. In the event that 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
- a description of alternative services or options

Best Practices: The members, guests and workers will be offered at least two formats (html and pdf) and notified of alternate formats available.

Information and Communications Standard

The AODA Information and Communications Standards focus on accessible formats and communication supports. To comply with these standards, all Club employees responsible for web content or printed materials are required to follow the Web Content Accessibility Guidelines (WCAG) 2.0 (Appendix 1). (Effective January, 2021)

The Club will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. The Club will consult with a member, guest, or worker making the request in determining the suitability of an accessible format or communication support and notify the members, guests, and workers about the availability of accessible formats and communication supports.

The Club's emergency procedures and individualized workplace emergency information should be reviewed and updated on a regular basis and made available to the members, guests, and workers in an accessible format or with appropriate communication supports.



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Feedback Process

TLTC shall provide members and workers with the opportunity to provide feedback on the accommodations and service provided to the members and workers with disabilities. Information about the feedback process will be readily available to all members and workers and notice of the process will be made available at the Front Desk. Feedback formats along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written or email) will be available upon request.

Best Practices: The members and workers will be informed about the feedback process and how action will be taken if a complaint is received.

The Club must acknowledge verbal/written/telephone feedback within two business days, and within fifteen business days of the receipt of a mailed/e-mailed complaint. In some cases, it may not be possible or appropriate to acknowledge feedback, for example, if the customer or worker wishes to remain anonymous, or indicates that he/she does not want to receive an acknowledgment.

Customers and workers can submit feedback to:

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| • David Main , COO/GM | dmain@torontolawn.com | 416-922-1105 (230) |
| • Jessica Litt , Member Services Manager | jlitt@torontolawn.com | 416-922-1105 (308) |
| • Katerine Malashenko , HR Manager | kmalashenko@torontolawn.com | 416-922-1105 (229) |

Administration: If you have any questions or concerns about this policy or its related procedures please contact:

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| • Katerine Malashenko , HR Manager | kmalashenko@torontolawn.com | 416-922-1105 (229) |
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Schedule 1: TLTC Accessible Customer Service Principles

Dignity: The principle of respecting the dignity of a person with a disability means treating them as workers, customers and clients who are valued and deserving high quality service and working conditions. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience. The delivery of goods and services must take into account how persons with disabilities can effectively access and use them.

Independence: In some instances, independence means freedom from control or influence of others – freedom to make one's own choices. In other situations, it may mean the freedom to do things in one's own way. People who may move or speak more slowly or differently must not be denied an opportunity to perform their job duties, participate in a program or service because of this. Staff must allow persons with disabilities to take the time they need, without rushing them or taking over a task for them if someone prefers to do it themselves in their own way.

Integration: The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, programs and services including practices and procedures are designed to be accessible to everyone, including members, guests and workers with disabilities.

Equal Opportunity: Equal opportunity means having the same chances, options, benefits and results as others. It means that persons with disabilities have the same opportunity as others to obtain, use and benefit from the way goods, services and employment are provided at the Club. They should not have to make significantly more effort to access or obtain services or perform their job responsibilities. They should also not have to accept lesser quality or more inconvenience.