



Union Water Supply System Inc.

Accessibility Policy

POLICY No: UW-A21-001

Date Adopted: September 24, 2025

1. PURPOSE

Union Water Supply System Inc. (“**UWSS Inc.**”) is committed to ensuring equal access and participation for people with Disabilities. We are committed to treating people with Disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with Disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario’s accessibility laws.

UWSS Inc. is committed to meeting its current and ongoing obligations under the Ontario *Human Rights Code* (“**OHRC**”) respecting non-discrimination.

UWSS Inc. understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”) and its accessibility standards do not substitute or limit its obligations under the OHRC or obligations to people with Disabilities under any other law.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with Disabilities.

2. SCOPE

This policy outlines our commitment to providing a respectful, welcoming and inclusive environment to all individuals who seek the services we provide. All of UWSS Inc.’s employees are expected to comply with this policy when delivering services to our customers or conducting business on behalf of UWSS Inc.

3. DEFINITIONS

- 3.1 **Accessible Formats:** Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with Disabilities.
- 3.2 **Assistive Device:** Any medical device, Mobility Aid, communication aid, or other aid that is especially designed to assist a person with a Disability with a need related to their Disability.
- 3.3 **Communication Supports:** Captioning, alternative and augmentative Communication Supports plain language, sign language, and other supports that facilitate effective communications.

- 3.4 **Constructive Discrimination:** Also referred to as adverse effect, is discrimination that unintentionally singles out a particular group, resulting in unequal treatment.
- 3.5 **Conversion-ready:** An electronic or digital format that facilitates conversion into an acceptable format.
- 3.6 **Customer Service Standards:** The standards set out in Part IV.2 of O. Reg. 191/11.
- 3.7 **Disability(ies):** Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.
- 3.8 **Mobility Aid:** Any manual or electric wheelchair, scooter, boarding chair, walker, cane, crutch, prosthesis, or other aid that is specially designed to assist a person with a Disability with a need related to mobility.
- 3.9 **Regulated Health Professional:** a member of one of the following colleges:
- (a) College of Audiologists and Speech-Language Pathologists of Ontario
 - (b) College of Chiropractors of Ontario
 - (c) College of Nurses of Ontario
 - (d) College of Occupational Therapists of Ontario
 - (e) College of Optometrists of Ontario
 - (f) College of Physicians and Surgeons of Ontario
 - (g) College of Physiotherapists of Ontario
 - (h) College of Psychologists of Ontario
 - (i) College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario
- 3.10 **Service Animal:** An animal is a service animal for an individual with a Disability if:
- (a) It is readily apparent that the animal is used by the individual for reasons relating to his or her Disability; or
 - (b) The individual provides a letter from a Regulated Health Professional confirming that the individual requires the animal for reasons relating to their Disability.
- 3.11 **Support Person:** Another person who accompanies an individual with a Disability in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

4. TRAINING

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the OHRC that relate to persons with Disabilities.

In addition, we will train:

- (a) all persons who participate in developing UWSS Inc's policies; and
- (b) all other persons who provide goods, services or facilities on behalf of UWSS Inc.

Training of our employees on accessibility relates to their specific roles.

Training includes:

- (a) purpose of the AODA and the requirements of the Customer Service Standards;
- (b) our policies related to the Customer Service Standards;
- (c) how to interact and communicate with people with various types of Disabilities;
- (d) how to interact with people with Disabilities who use an Assistive Device or require the assistance of a service animal or a Support Person;
- (e) how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with Disabilities; and
- (f) what to do if a person with a Disability is having difficulty in accessing UWSS Inc.'s goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

5. EMPLOYMENT

UWSS Inc. makes every effort to identify, remove, and prevent barriers to employment by developing inclusive procedures that support and accommodate persons with Disabilities throughout the recruitment and employment process. Whenever a candidate requires accommodation to fully participate in the recruitment and selection process, or a current employee requires accommodation in the workplace, the corporation works with the individual to provide the necessary accommodations, up to the point of undue hardship.

5.1 Job Design

UWSS Inc. proactively conducts thorough job analyses to ensure that both new and existing job requirements are bona fide occupational requirements—reasonable and made in good faith. To determine whether a requirement is bona fide, UWSS Inc. considers the following:

- (a) The requirement is rationally connected to performing the job;

- (b) The requirement is adopted in good faith and serves a legitimate work-related purpose;
- (c) The requirement is reasonably necessary to accomplish a work-related task or process.

If a requirement is found not to be bona fide, UWSS Inc. evaluates whether reasonable accommodations can be provided to ensure equal opportunity in the workplace. UWSS Inc. is committed to ensuring that job design is non-discriminatory, including assessing job and work requirements for potential Constructive Discrimination.

5.2 Recruitment and Hiring

UWSS Inc. conducts recruitment and selection activities in a manner that ensures dignity and inclusion for all participants. UWSS Inc. notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. Additionally, UWSS Inc. notifies job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request.

Upon request, UWSS Inc. provides candidates with reasonable accommodations during the interview and selection process. UWSS Inc. works with the candidate to arrange suitable, personalized accommodations, such as providing the application in an alternate or Accessible Format.

UWSS Inc. is committed to making hiring decisions that are unbiased and based on qualifications and experience. The interview process focuses on assessing experience and skills and will not discriminate against candidates with Disabilities or those requiring accommodations—whether during the interview process or if accommodations are needed after hire. Successful candidates are informed of policies and available supports for accommodations upon completion of the recruitment process.

5.3 Training and Development

UWSS Inc. recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for all employees. To support this, all employees are equally considered for training opportunities, and UWSS Inc. does not discriminate against employees requiring accommodation when determining eligibility for training and development.

UWSS Inc. tailors training and development programs to meet the needs of employees with Disabilities, offering training as soon as reasonably practicable upon the assignment of applicable duties. These programs are designed with flexibility, allowing customization to accommodate the individual needs of employees, such as providing training materials in Accessible or Conversion-ready Formats. UWSS Inc. also considers potential barriers employees may face when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.

5.4 Emergency Response

If necessary or upon request, UWSS Inc. creates individualized workplace emergency response plans for employees with Disabilities. These plans are designed to address the unique challenges posed by the individual's Disability and the physical characteristics of the workplace and are developed in consultation with the employee.

In cases where an employee with a Disability requires assistance from a Support Person during an emergency, UWSS Inc. will designate a fellow employee, mutually agreed upon by the employee and UWSS Inc., to act in this role. This designated employee will receive first aid training and certification as needed to provide appropriate emergency support.

Customized emergency response plans are reviewed under the following circumstances:

- (a) When the employee relocates to a different physical location within UWSS Inc.
- (b) When the employee's overall accommodation needs or plans are reviewed.
- (c) When UWSS Inc. reviews its general emergency response policies.

5.5 Return To Work

UWSS Inc. offers a supportive return-to-work program and establishes processes to assist employees who have been absent due to a Disability and require accommodations to re-enter the workplace. In collaboration with the employee, UWSS Inc. develops an individualized return-to-work plan that supports the employee during the transition period by identifying and addressing any barriers.

The return-to-work process outlines the specific steps UWSS Inc. will take to facilitate the employee's return, including any accommodation needs tailored to the individual.

We have a separate written process for employees who have been absent from work due to a Disability and require Disability-related accommodations in order to return to work.

5.6 Accommodations

We notify staff that supports are available for those with Disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a Disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to Disability. We will consult with the person making the request in determining the suitability of an Accessible Format or Communication Supports specifically 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.

We have a separate written process to develop individual accommodation plans for employees.

5.7 Redeployment / Inability to Accommodate

If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, UWSS Inc. will consider redeployment by placing the employee in an alternative position within UWSS Inc. Depending on the employees' needs, redeployment to an alternative position may be temporary or permanent. UWSS Inc. will work with management and the employee to determine whether there is another available and suitable position to accommodate the employees' needs. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

6. CUSTOMER SERVICE

6.1 Access to Goods and Services

UWSS Inc. is committed to providing barrier-free access to its goods and services for all customers. In cases where barriers cannot be removed, UWSS Inc. will offer alternative methods for accessing goods and services to the best of its ability.

6.2 Service Animals

We welcome people with Disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a Regulated Health Professional that confirms the person needs the service animal for reasons relating to their Disability.

If service animals are prohibited by another law, we will do the following to ensure people with Disabilities can access our goods, services or facilities:

- (a) explain why the animal is excluded; and
- (b) discuss with the customer another way of providing goods, services or facilities

6.3 Support Persons

UWSS Inc. welcomes individuals with Disabilities who are accompanied by a Support Person. If a person with a Disability is accompanied by a Support Person, UWSS Inc. ensures that both individuals can enter the premises together, and the person with a Disability is not restricted from having access to their Support Person.

UWSS Inc. does not charge admission fees for entry to its facilities or services. Accordingly, no admission fees apply to Support Persons.

Whenever possible, UWSS Inc. will make accommodations to allow the customer and their Support Person to sit together. In situations where confidential information may be discussed, consent will be obtained from the customer before sharing any potentially confidential details in the presence of the Support Person.

In certain cases, UWSS Inc. might require a person with a Disability to be accompanied by a Support Person for the health or safety reasons of:

- (a) the person with a Disability; and/or
- (b) others on the premises.

Before making a decision, UWSS Inc. will:

- (a) consult with the person with a Disability to understand their needs;
- (b) consider health or safety reasons based on available evidence; and
- (c) determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

If UWSS Inc. determines that a Support Person is required, we will waive the admission fee or fare (if applicable) for the Support Person.

6.4 Assistive Devices

People with Disabilities may use their personal Assistive Devices when accessing our goods, services or facilities.

In cases where the Assistive Device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a Disability can access our goods, services or facilities.

We 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.

7. COMMUNICATION

We have a process for receiving and responding to feedback and the process is accessible to persons with Disabilities upon request. We notify the public about the availability of Accessible Formats and Communication Supports by including a notice on our website, at public reception areas, and in written communications.

We communicate with people with Disabilities in ways that take into account their Disability. When asked, we will provide information about UWSS Inc. and its services, including public safety information, in Accessible Formats or with Communication Supports:

- (a) in a timely manner, taking 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.

We will consult with the person making the request in determining the suitability of an Accessible Format or Communication Support. If UWSS Inc. determines that information or communications are unconvertible, UWSS Inc. shall provide the requestor with:

- (a) an explanation as to why the information or communications are unconvertible; and
- (b) a summary of the unconvertible information or communications.

We meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

7.1 Service Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of UWSS Inc. In the event of any temporary disruptions to facilities or services that customers with Disabilities rely on to access or use goods or services, customers will be promptly notified and reasonable efforts will be made to provide advance notice.

When disruptions occur, the UWSS Inc. will:

- (a) Post notices in the nearest accessible entrance to the service disruption;
- (b) Update the UWSS Inc. website, and applicable social media platforms with information about the disruption; and
- (c) Contact customers with reservations or appointments by any method that may be reasonable under the circumstances.

Notices under this section will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

7.2 Emergency Notifications

UWSS Inc. provides emergency and public safety information, plans, procedures, maps and warning signs at evacuation points, and any other emergency alert information in Accessible Formats or with appropriate Communication Supports, upon request. Alarm systems are both auditory and visual.

UWSS Inc. will:

- (a) Work with any individuals requesting information to best meet their needs;
- (b) Ensure emergency information can be seen, read, and heard by anyone, including people with Disabilities; and
- (c) If a person with a Disability requires assistance in an emergency, make sure an employee is available to assist.

8. FEEDBACK

UWSS Inc. acknowledges that customer and employee feedback is crucial in improving services, increasing clientele, reducing complaints, enhancing working conditions, and fostering a positive workplace culture, particularly regarding accessibility. UWSS Inc. ensures that individuals with Disabilities have various ways to provide feedback. Accessible feedback forms, along with alternative methods for submitting feedback, are available upon request.

Individuals who provide formal feedback will receive an acknowledgment of their submission, along with information regarding any actions taken in response to their concerns or complaints.

Feedback can be submitted by mail to:

Union Water Supply System Inc.

1615 Union Avenue

Box 340

Ruthven ON N0P 2G0

By Telephone:

519-326-1668

By Email:

HR@unionwater.ca

Feedback can be provided anonymously if desired, and feedback remains confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. The personal information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.

9. NOTICE OF AVAILABILITY OF DOCUMENTS

UWSS Inc. notifies the public that documents related to accessible customer service, are available upon request by posting a notice on its website.

UWSS Inc. will provide these documents in an Accessible Format or with Communication Support, on request. We will consult with the person making the request to determine the suitability of the format or Communication Support. We will provide the Accessible Format in a timely manner and, at no additional cost.

10. PROCUREMENT

We incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks. If it is not possible and practical to do so, we will provide an explanation upon request.

11. BUILDING ACCESSIBILITY

UWSS Inc. works to ensure that the built environment, including building interiors and exteriors, is designed to facilitate barrier-free access to goods, services, and employment for customers and employees. If areas of the built environment are not accessible for certain individuals with Disabilities, the organization will work with the individual to provide an alternate means of access up to the point of undue hardship.

Record of Amendments

Version	Date	Amendment Description	Approved By
1.0	September 24, 2025	Initial policy approval and implementation	Board of Directors