

AODA Policy

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AODA Policy	HR-003	October 13, 2015
Issuing Department	Version	Date of Last Review
HR	1.0	July 22, 2026
Business Owner	Approver	Effective Date
Sr. Director of People Performance and Culture	Sr. Director of People Performance and Culture	October 13, 2015

Review History

Version	Date of Review	Key Revisions (if applicable)
1.0	April 1, 2026	Initial Version

1.0 Introduction

In accordance with the Accessibility for Ontarians with Disabilities Act (AODA), Ontario Dig Authority is committed to providing a work environment that is accessible and inclusive to all persons who work or visit our workplace. Ontario Dig Authority will work with individuals that request accommodation in an effort to ensure that the measures taken are both effective and mutually agreeable, by making adjustments or modifications to the work or work environment, up to the point of undue hardship. Accommodation may be temporary, or permanent, based on the requirements of the individual.

2.0 Scope of this Document

This policy applies to all staff performing work for Ontario Dig Authority in any capacity. This includes permanent and temporary or fixed term employees, co-op students, independent contractors, consultants or individuals representing Ontario Dig Authority in any capacity for any length of time. All staff within this scope are required to understand and comply with the expectations, responsibilities, and obligations outlined in this policy.



3.0 Definitions

Term	Definition
Disability	Under the AODA, the definition of “disability” is the same as the definition in the Ontario Human Rights Code: - 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; - 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 or using symbols or spoken language; - a mental disorder; or - an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
Guide dog	A dog trained as a guide for a blind person that has completed a training program at a designated training facility set out in the Guide Dogs Regulation.
Service Animal	An Animal is a service animal for a person with a disability if: - The animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators, such as the vest or harness worn by the animal; or - The person provides documentation from a designated regulated health professional confirming that the person requires the animal for reasons relating to the disability.
Support Persons	In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods, services, and facilities.
BFORs and	Ontario Dig Authority cannot provide accommodation for bona fide occupational requirements. If the company cannot accommodate an individual’s needs without experiencing undue hardship or due to a BFOR, the company will explain its reasoning to



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the individual. Where the company cannot provide full accommodation, the company may be able to provide partial accommodation.

4.0 Principles

- 4.1.1 Caring: ODA invests in the success and safety of all staff members, communities, and the environment.
- 4.1.2 Inclusive: ODA is a leader in inclusivity and cultivates a foundation of respect and support within our industry
- 4.1.3 Collaborative: ODA fosters partnerships both within the organization and throughout Ontario

5.0 Rules

5.1 Information & Communication

- 5.1.1 When communicating with a person with a disability, Ontario Dig Authority will do so in a manner that takes into account the person's disability. Ontario Dig Authority commits to provide training regarding how to interact and communicate with persons with various types of disabilities.

5.2 Service Animals, Support Persons and Assistive Technology

- 5.2.1 Ontario Dig Authority welcomes service animals, support persons and assistive technology utilized by persons with a disability. There may be some restrictions to service animals in extenuating circumstances so please contact Human Resources for more information if needed.

5.3 Employment

- 5.3.1 Ontario Dig Authority is committed to fair and accessible employment practices and is willing to provide accommodations at any point in the employment relationship, from recruitment, to advancement, and returns to work.

5.4 Emergency Response

- 5.4.1 Ontario Dig Authority has posted in all of its facilities clearly labelled emergency exit plans. These plans are available in alternate electronic format upon request. In addition, upon orientation, all staff are advised of emergency evacuation procedures. This information is available to all visitors to Ontario Dig Authority. Ontario Dig Authority is committed to providing customized emergency response plans to staff upon request.

5.5 Facilities



- 5.5.1 Ontario Dig Authority offices have been designed to be fully accessible and free of physical barriers. Monthly workplace inspections have incorporated checklists to ensure the facilities remain barrier free.
- 5.6 Educational Material and Training Resources
 - 5.6.1 Ontario Dig Authority strives to ensure that all resources developed for the purpose of education and training are created with the intent of being fully accessible.
- 5.7 Web Platform and Digital Services
 - 5.7.1 Ontario Dig Authority is committed to ensuring accessibility of our web platform and digital services as much as possible. The company will continue to implement the OntarioDigAuthority.ca platform to ensure it is accessible and remains so by evaluating the content and applications every two years. The accessibility evaluation is overseen by the Marketing and Communications department.
- 5.8 Requests for Medical Information
 - 5.8.1 In order to support an accommodation request, Ontario Dig Authority may request medical information. Human Resources will make requests for medical information only if the request clearly relates to the accommodation being sought or if the staff needs are complex or unclear. The focus of the request for information will be on the functional limitations associated with the staff's disability, rather than the diagnosis.
- 5.9 Notice of Planned or Unplanned Disruption in Services and Facilities
 - 5.9.1 In the event of a service disruption to staff or members of the public, it is the responsibility of individual service areas (i.e. Human Resources, IT Services, etc.) to take reasonable steps to report such disruption in a timely fashion through appropriate information channels. Such channels include, but are not limited to, the Ontario Dig Authority website, internal SharePoint website, temporary signage on or immediately adjacent to the affected area, and/or communication via email to affected individuals or groups. In accordance with the AODA, notice must be conspicuous and indicate any alternatives that exist to allow access to persons with disabilities during the disruption.

6.0 Training, Communication, Oversight & Audit



- 6.1 Ontario Dig Authority will provide training to staff on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of staff.
- 6.2 HR will communicate with staff the contents of this policy after the effective date.
- 6.3 New staff will be asked to review this policy during the new hire onboarding process
- 6.4 Changes to this policy will be communicated to all staff at least once annually, during which all staff will sign off on a review of all changes.
- 6.5 Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.
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7.0 Evaluation & Review

- 7.1 This policy document shall follow the regular schedule of review with at least one policy review occurring every three years.
- 7.2 Feedback about the delivery of services to persons with disabilities is welcomed, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be forwarded by telephone, in person, in writing, by email, on USB or otherwise. Ontario Dig Authority will make best efforts to provide a response in the same format in which the feedback was received. Where possible, feedback will be addressed immediately. Some feedback may, however, require more effort to address and may need to be reviewed before an action is taken. Ontario Dig Authority will respond within 21 working days to all formal feedback.
- 7.3 Feedback may be provided directly to:
 - Mail: Human Resources, 1-104 Cooper Road, Guelph, ON, N1C 1C3
 - Telephone: (519)265-8006 ext. 8823
 - Fax: (519)837-5410
 - Email: HR@OntarioDigAuthority.ca
 - In person: Head of Human Resources, 1-104 Cooper Road, Guelph, ON

8.0 Associated Documents

- 8.1 Accessibility for Ontarians with Disabilities Act

9.0 Approval



- 9.1 This policy was approved by the Senior Director of People, Performance and Culture on July 22, 2026.

