



Policy	Accessibility
Org Name	Paragon Security
Issue Date	January 2010
Revised:	March 2024

PURPOSE

To meet accessibility standards as set out in the Accessibility for Ontarians with Disabilities Act ensuring people with disabilities have the same kind of opportunities as other employees and/or clients.

The purpose of this Customer Service Standards Policy is to fulfill the requirements set out in Regulation 429/07 of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and to establish a policy for Paragon Protection Ltd (“Paragon Security”) that governs the provision of its programs and services to persons with disabilities.

*Participants = participants, clients, visitors, volunteers, and employees.

POLICY

1. Our Commitment

Paragon Security is committed to ensuring equal access and inclusive participation for people with disabilities. We are also committed to treating people with disabilities in a way that respects dignity and independence. We believe in integration and 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.

The company’s framework for accessibility supports a workplace that is accessible by all and is fully compliant with the standards and requirements as stipulated under the Accessibility for Ontarians with Disabilities Act 2005 and Integrated Standards for Customer Service, O. Reg. 429/07. This shall be accomplished through the following components:

- (4) Integrated Accessibility Standards Regulation (IASR) Communication and Information
- (5) Integrated Accessibility Standards Regulation (IASR) Transportation
- (6) Integrated Accessibility Standards Regulation (IASR) Employment

2. Guiding Principles for Providing Programs and Services to People with Disabilities

Paragon Security takes reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following four principles:

- **Dignity** – provide service in a way that allows the person with a disability to maintain self-respect and the respect of other people.
- **Independence** - a person with a disability is allowed to do things on their own without unnecessary help or interference from others.
- **Integration** - provide service in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless a different way is necessary to enable them to access goods, services, or facilities.



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- **Equal Opportunity** – provide service to a person with a disability in such a way that they have an equal opportunity to access your goods, services, or facilities as what is given to others.

3. Definitions

Accessible Formats: commonly refers to alternatives to standard communication such as print and may include:

- reading written information to a person directly
- large print
- text transcripts of audio or visual information
- handwritten notes instead of spoken word
- braille
- an electronic document formatted to be accessible for use with a screen reader

Barrier: defined as anything preventing an individual with a disability from fully participating in all aspects of society because of their disability. These may include:

- a physical barrier
- an architectural barrier
- an informational or communications barrier
- an attitudinal barrier
- a policy, practice, or procedural barrier

Disability: under the AODA Act 2005, Disability is defined as:

- 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 impairment, deafness or hearing 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 (1) 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.



Policy	Accessibility
Org Name	Paragon Security
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Service Animals – under the AODA Act 2005, Service Animals are defined as:

“an animal is a service animal for a person 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 - under the AODA Act 2005, Support Person is defined as:

“a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, or medical needs or with access to goods or services.”

Paragon Security is committed to excellence in serving all participants including people with disabilities and we will carry out our functions and responsibilities in the following areas:

4. Best Practices relating to Communication & Information

4.1 *Communication*

We will endeavor to do our best to communicate with people with disabilities in ways that take their disability into account. All reasonable efforts shall be made to provide communications that are available in multiple formats (e.g., verbal, written, or electronic) as required. Special requests regarding any accessible format shall not be unreasonably declined.

We will train staff who communicate with participants how to interact and communicate with various types of disabilities.

We will ask how we can help.

4.2 *Telephone Services*

We are committed to improving accessible telephone service to our participants. We will train our staff to communicate with participants over the telephone in clear and plain language, and speak clearly and slowly.

We will offer to communicate with participants through email, relay services, and written means if telephone communication is not suitable for their communication needs or is not available.

4.3 *Website Accessibility*

The company will ensure that, wherever possible, its website and all web content conform to the Web Content Accessibility Guidelines (WCAG).



Policy	Accessibility
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4.4 Assistive Devices

We are committed to serving people who need assistive devices to obtain, use, or benefit from our programs and services. These may include, but are not limited to, devices such as: wheelchairs, canes, walkers, scooters, and braille displays. The company shall further provide that staff are adequately trained and familiar with any assistive device that may be required on its premises.

4.5 Guide Dogs, Service Animals, and Service Dogs

A customer with a disability that is accompanied by a guide dog, service animal, or service dog will be allowed to access premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals, and/or service dogs.

If it is not readily apparent that the animal is being used by the visitor for reasons relating to their disability, Paragon Security may request verification from the visitor.

The visitor who is accompanied by a support animal is responsible for always maintaining care and control of the animal.

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

4.6 Use of a Support Person

If the person with a disability is accompanied by a support person, Paragon Security will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times when seating and availability prevent the visitor and support person from sitting beside each other. In these situations, Paragon Security will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the visitor before any conversation.

4.7 Notice of Temporary Disruption

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Paragon Security. Paragon Security will provide participants with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed on our website, and at all public entrances.



Policy	Accessibility
Org Name	Paragon Security
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4.8 Workplace Emergency Response

If deemed necessary and different from its existing emergency response plans, the company will develop individualized workplace emergency response plans for any disabled employee and to any designated employee assigned to assisting the disabled employee.

Employee's workplace emergency response information will only be shared with their consent should other persons be designated to support or assist in an emergency.

4.9 Training

Paragon Security will provide training to all participants, clients, visitors, volunteers, and employees, who deal with the public or other third parties on their behalf, and all those who are involved in the development and approval of service policies, practices, and procedures. Training provided is appropriate to the duties of the participants, clients, employees, volunteers, and other persons and includes the AODA, OHRC training and IASR standards specific training.

Training will include:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005, and the requirements of the customer service standard.
- Instructions on how to interact with persons with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog, service dog, or other service animal; or
 - Require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help persons with disabilities.

Participants, clients, visitors, volunteers, and employees. will also be trained on an ongoing basis when changes are made to these policies, practices, and procedures.

4.10 Feedback Process

The ultimate goal of Paragon Security is to meet and surpass participant expectations when serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcomed and appreciated.

Feedback can be shared with the Service Team Manager or Director of the service/location or via one of these methods below

- E-mail: Kevin Sanjari, President – KSanjari@pplguard.com
- Mail: Kevin Sanjari, President
Paragon Security
1210 Sheppard Avenue East, Suite 488
Toronto, Ontario M2K 1E3
- Phone: (416) 498-4000
- Website: www.ParagonSecurity.ca



Policy	Accessibility
Org Name	Paragon Security
Issue Date	January 2010
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5. Best Practices relating to Transportation

The IASR Transportation Standard establishes requirements pertaining to the provision of transportation services to employees with disabilities.

The company is not primarily in the business of transportation, but should it be required to periodically provide or arrange for transportation services for company related functions, will ensure it provides accessible transportation services (upon request) for persons with disabilities, and is provided at no additional cost.

6. Best Practices relating to Employment

The IASR Employment Standard establishes requirements pertaining to accommodating employees and job applicants with disabilities throughout the job application process and the employment relationship.

6.1 *Recruitment*

For every recruitment launched, the company will inform the public of its commitment toward accommodating candidates and in providing an accessible workplace. This can be done either by including a statement directly on the job posting or by directly informing candidates selected for an interview. All reasonable measures will be taken to accommodate the needs of any applicant.

Successfully selected applicants (new hires) will be provided copies of all the company HR policies, including those regarding disability, accessibility, and accommodation.

6.2 *Assistive Devices*

The company shall encourage any employee with a disability to use their own personal assistive device on company premises and will provide all reasonable accommodation and support possible. These may include, but are not limited to, devices such as: wheelchairs, canes, walkers, scooters, and braille displays. The company shall further provide that staff are adequately trained and familiar with any assistive device that may be required on its premises.

6.3 *Service Animals and Support Persons*

The company shall consult with the employee with a disability to understand their needs and to consider the health or safety implications of having a service animal or support person in the workplace based on available evidence. Upon assessing these factors, the company openly welcomes service animals and support persons upon whom persons with disabilities may rely.

In addition to the above accommodations for employees, we will provide customized emergency information to help an employee with a disability during an emergency to ensure a designated person may be assigned, where applicable.



Policy	Accessibility
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We have a written process to develop individual accommodation plans for employees as well as for employees returning from an absence from work due to a disability. See policy on Accommodations and Return to Work.

7. Modifications to This or Other Policies

We are committed to developing service policies that respect and promote the dignity and independence of persons with disabilities. Therefore, no changes will be made to this Policy before considering the impact on persons with disabilities.

Any policy of Paragon Security that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

8. Questions About This Policy

This Policy exists to achieve service excellence for participants with disabilities. It is available in accessible formats or communication supports, upon request. If anyone has a question about the Policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to the Vice President, Human Resources.

9. Administration of the Policy

Responsibility for the periodic review and revision of the Policy lies with the Senior Management Team. The Policy will be reviewed and approved by the President of the Company.