

<b>ALL SENIORS CARE LIVING CENTRES</b>	
<b>Manual:</b> Human Resources	<b>Page 1 of 13</b>
<b>Owner:</b> Corporate Manager of Human Resources	<b>Effective Date:</b> Feb 2016
<b>Approver:</b> Vice President of Compliance	<b>Revised or Reviewed Date:</b>

## **Accessibility**

### **Purpose:**

All Seniors Care Living Centres (ASC) ensures our commitment and compliance with the provision of accessible goods and services to persons with disabilities as required by both legislative and ongoing regulatory requirements as they are phased into effect. Our multi-year accessibility plan attached supports our advancements in meeting the requirements of the AODA in removing barriers for persons with disabilities.

### **Policy:**

ASC is committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

In accordance with the Ontarians with Disabilities Act, (ODA) 2001 and the Accessibility for Ontarians with Disabilities Act (AODA) 2005 all persons with disabilities will be given an opportunity equal to that given to others, to obtain, use or benefit from the services provided by and on behalf of All Seniors Care Living Centres (ASC). Specifically, ASC will identify, remove and prevent barriers to people with disabilities who access ASC facilities and services, including Employees, Residents, Visitors, Contractors and other Community Members.

Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities as defined in the Ontario Human Rights Code and the AODA. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.

### **Application:**

Unless otherwise limited herein, the Policy applies to all:

- i. employees and volunteers;
- ii. persons who provide goods, services and/or facilities to residents, their families and friends, the public or other third parties on behalf of ASC; and
- iii. persons responsible for the development of ASC's policies.

This Policy does not replace or affect existing legal obligations under the *Human Rights Code* R.S.O. 1990, c. H.19, as it may be amended from time to time, or any other applicable laws respecting the accommodation of persons with disabilities.

## Roles and Responsibilities:

- Human Resources is responsible for reviewing and updating this policy as needed.
- Managers are accountable for ensuring that this policy is communicated to staff and is carried out consistently.
- Staff are responsible for being aware of accessibility legislation, meeting these requirements in their daily work, and ensuring that accessible customer service is provided at ASC Locations in accordance to this policy and related procedures.

For more information about the Policy or ASC's Accessibility Plan please contact:

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## Definitions:

- i. **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.
- ii. **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.
- iii. **Disability** – means:
  - 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 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,
  - 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*
- iv. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

- v. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- vi. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff, when a particular job or department has been eliminated.
- vii. **Self-Service Kiosk** – means 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 or both.
- viii. **Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.
- ix. **Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making websites and web content accessible to people with a wide-range of disabilities. The IAS requires ASCs to become compliant with two levels of the WCAG - Level A and Level AA.

**ASC Multi-Year Accessibility Workplan:**

Item	Requirement of the AODA	Compliance Deadline	Status
	<b>General:</b>		
1.	<b>Accessibility Policy and Procedures:</b>  Creation of policies and procedures on providing goods or services to persons with disabilities according to principals set out in regulation. Upon request, provide the document in an assessible format.	Jan 1, 2012	
2.	<b>Notice of Temporary Disruptions:</b>  Provide public notice of disruption in facilities or services by posting on premises which includes anticipated duration and description of alternatives if available.	Jan 1, 2012	

3.	<p><b>Service Animals Support Persons and Assisted Devices:</b></p> <p>Employees with disabilities may bring their service animal to ASC Locations, and will be able to keep their service animal with them unless the animal is expressly excluded from the area within ASC by law.</p> <p>If it is not readily apparent that the animal is a service animal, the person with a disability may be required to provide proof. Proof can be from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability or documentation that shows the person is certified as a service animal handler. It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.</p> <p><b>Support Persons:</b></p> <p>Any employee with a disability who is accompanied by a support person (e.g., sign language interpreters, real-time captioners, or attendants) will be allowed to enter ASC Locations, with that person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to that person while on ASC premises.</p> <p><b>Assistive Devices:</b></p> <p>ASC locations will strive to effectively serve persons with disabilities who use assistive devices, to obtain, use or benefit from these devices in their relationship with ASC.</p> <p>ASC locations will inform Residents, Employees, Contractors, Visitors and other Guests of the assistive devices (e.g. TTY, sound amplification systems, mobility devices, video remote interpreting services, etc.) available at the various locations and ensure staff are trained on how to use them.</p>	Jan 1, 2012	
4.	<p><b>Training:</b></p> <p>Provide all employees, contract staff and volunteers with the training needed to meet AODA Customer Service Standards including the specific topics set out in the regulation. Ensure training is provided on an ongoing basis to reflect any changes to policies and/or procedures. Keep records of training provided,</p>	Jan 1, 2012	

	including dates and number trained.		
<b>5.</b>	<b>Feedback:</b>  Establish a written process for receiving and responding to feedback; make information about process publicly available.	<b>Jan 1, 2012</b>	
<b>6.</b>	<b>Reporting:</b>  File the compliance report for the Accessibility Standards for Customer Service.	<b>Jan 1, 2012</b>	
<b>7.</b>	<b>Statement of Commitment:</b>  ASC has developed a Statement of Commitment which forms part of this document located in our Accessibility Policy.  Our accessibility policy is available to the public and in an accessible format.	<b>Jan 1, 2014</b>	
<b>8.</b>	<b>Accessibility Workplan:</b>  ASC will maintain the Accessibility Plan in accordance with the requirements of the IAS. The Accessibility Plan will be reviewed and updated at least once every five (5) years.  The Accessibility Plan is posted on ASC's website and will be made available in an Accessible Format upon request.	<b>Jan 1, 2014</b>	
<b>9.</b>	<b>Reporting:</b>  File and certify our compliance report for the Accessibility Standards for Customer Service every three years. This report is available to the public upon request and available in an accessible format.	<b>Dec 31, 2014</b>	
<b>10.</b>	<b>Training:</b>  Training will be provided to the duties of the employees, contractors, students, volunteers and other persons who provide goods and services to our Residents, and will include:	<b>Jan 1, 2015</b>	

	<p>A review of the purpose of the AODA, Requirements of the Accessibility Standards for Customer Service Regulation and the standards referred to in the Integrated Accessibility Standards Regulation that impact on the delivery of Location services, Ontario Human Rights Code as it pertains to persons with disabilities, and Site Specific Location policies, practices and procedures on the provision of services to persons with disabilities.</p> <p>Instruction will include how to interact and communicate with persons with various types of disabilities, how to interact with persons with disabilities who use assistive devices or require the assistance of service animals or support persons, how to use assistive communication devices and other assistive devices available at Locations; and what to do if a person with a disability is having difficulty accessing ASC goods and services.</p> <p>New staff as well as those who take on new duties that involve interaction with our Residents, their families or other visitors to ASC will receive training as part of their orientation. Training will be provided as soon as is practicable upon an individual being assigned the applicable duties.</p> <p>Training will also be provided on an ongoing basis when changes are made to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.</p> <p>All Locations will keep records of the accessibility training provided, including the dates on which training took place and the number of individuals to whom it was provided.</p>		
	<b>Information and Communications Standards:</b>		
11.	<p><b>Emergency Plans and Procedures:</b></p> <p>If an employee has a disability and ASC is aware that, due to that disability, the employee requires an individualized workplace emergency response, information addressing such response will be provided to the employee as soon as practicable after ASC or any contractual service provider of ASC becomes aware of such requirement.</p> <p>In such a case, with the employee's consent, ASC will designate a colleague(s) to provide such individualized assistance and will ensure that this colleague is provided with a copy of employee's individualized emergency response information.</p>	Jan 1, 2012	

	<p>ASC will review the individualized workplace emergency response information when (i) the employee moves to a different work location; (ii) the employee's overall accommodations needs or plans are reviewed; and (iii) when ASC reviews its general emergency response policies.</p>		
<b>12.</b>	<p><b>Accessible Websites and Web Content</b></p> <p>ASC will ensure our website is accessible to people with disabilities by conforming to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0. Level "A"</p>	<b>Jan 1, 2014</b>	
<b>13.</b>	<p><b>Self Service Kiosks:</b></p> <p>ASC will have regard to the accessibility for persons with disabilities when designing, procuring or acquiring Self-Service Kiosks.</p>	<b>Jan 1, 2014</b>	
<b>14.</b>	<p><b>Reporting:</b></p> <p>File and certify an Accessibility report every three years Make the report available to the public and upon request, in an accessible format.</p>	<b>Dec 31, 2014</b>	
<b>15.</b>	<p><b>Feedback:</b></p> <p>ASC will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.</p> <p>ASC will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.</p> <p>ASC Complaints will be addressed in accordance with ASC policy. However, some complaints may require more time and effort to address, such as consultations at a higher level.</p>	<b>Jan 1, 2015</b>	

16.	<p><b>Accessible Formats and Communication Supports:</b></p> <p>ASC will, upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.</p> <p>Accessible Formats and Communication Supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.</p> <p>ASC will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, ASC reserves the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.</p>	Jan 1, 2016	
	<p><b>Employment Standards: <i>Applies to all Employees and Contract Employees but not to Volunteers</i></b></p>		
17.	<p><b>General Recruitment:</b></p> <p>ASC will inform its existing employees of its policies on supporting 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.</p> <p>ASC will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.</p> <p>All employees hired after the Informing Employees of AODA Policies Compliance Deadline will be notified of ASC's policies on supporting employees with disabilities as soon as practicable after commencing employment.</p> <p>ASC will notify the public and employees of the availability of accommodation for job applicants during the recruitment process.</p>	Jan 1, 2016	
18.	<p><b>Selection:</b></p> <p>ASC or any contractual service providers to ASC will further notify all job applicants who are individually selected to participate in an assessment or selection</p>	Jan 1, 2016	



	<p>process that accommodation is available upon request if the applicant requires accommodation due to a disability.</p> <p>If an applicant requests accommodation, ASC 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.</p> <p>ASC will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.</p> <p>ASC will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.</p>		
19.	<p><b>Performance Management:</b></p> <p>ASC or any contractual service providers to ASC will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.</p>	Jan 1, 2016	
20.	<p><b>Return to Work:</b></p> <p>ASC has a return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.</p> <p>The return to work process outlines the steps ASC has taken to facilitate the employee's return to work and will use documented individual accommodation plans to record return to work information and requirements.</p>	Jan 1, 2016	
21.	<p><b>Accommodations:</b></p> <p>ASC has a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:</p> <ul style="list-style-type: none"> <li>i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> </ul>	Jan 1, 2016	

	<ul style="list-style-type: none"> <li>ii. The means by which the employee is assessed on an individual basis.</li> <li>iii. The manner in which ASC can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</li> <li>iv. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</li> <li>v. The steps ASC will take to protect the privacy of the employee's personal information.</li> <li>vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ul> <p>Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.</p> <p>Where required, an employee's individual accommodation plan will include individualized workplace emergency response information as described in section.</p>		
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<b>22.</b>	<b>Career Development and Advancement:</b>  ASC will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to its employees with disabilities.	<b>Jan 1, 2016</b>	
<b>23.</b>	<b>Redeployment:</b>  ASC will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	<b>Jan 1, 2016</b>	
<b>Built Environment Standards:</b>			
<b>24.</b>	<b>Design of Public Spaces Standards</b>  ASC will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017.  Accessible Off-Street Parking:  ASC will ensure that when constructing new or redeveloping off-street parking facilities that it intends to maintain, the applicable off-street parking facilities shall meet the requirements set out in Sections 80.32 through 80.38 of the IASR.  Exterior Paths of Travel:  When constructing all applicable new or redeveloped paths of travel (e.g., external walkways) that are not regulated by the Ontario Building Code, ASC ensures that they meet the requirements as set out in Sections 80.1 through 80.5 and 80.23 through 80.31 of the IASR. (Note: Most of the exterior paths of travel (e.g., external walkways) that are constructed by ASC are regulated by the Ontario Building Code.)  Maintenance – ASC will establish procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under the Accessibility Standards for the Built Environment. This will include temporary service disruptions when accessible elements under the IASR are not in working	<b>Jan 1, 2017</b>	

	order.		
<b>25.</b>	<p><b>ALL Internet Sites and Web Content</b></p> <p>By the Final Website Compliance Deadline ASC will ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level “AA” to the extent required by the IAS.</p> <p>When determining whether meeting the requirements of this section is practicable ASC will consider: i. the availability of commercial software or tools required to achieve web accessibility; and ii. the impact meeting the requirements of this section will have on projects planned before January 1, 2012.</p> <p>The commitment to provide accessible websites and web content only applies to websites and web content that ASC controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.</p>	<b>Jan 1, 2021</b>	

## 1. DEFINITIONS

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