

Integrated Accessibility Standards Policy

Policy:

Greenwood Retirement Communities (the “Company”) is committed to developing, implementing, and maintaining policies aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

The purpose of this Integrated Accessibility Standards Policy (the “Policy”) is to identify and document how Greenwood Retirement Communities (the “Company”) currently achieves accessibility by meeting the requirements of the IAS and how it will continue to work towards improving accessibility for persons with disabilities.

Please refer to our Accessible Customer Service Policy to learn how Greenwood Retirement Communities (the “Company”) is meeting the requirements of the Customer Service Standard and promoting its underlying core principles.

Unless otherwise limited herein, the Policy applies to all:

- i. employees and volunteers,
- ii. persons who provide goods, services and/or facilities to the public, residents or other third parties on behalf of the Company; and
- iii. persons responsible for the development of the Company’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.

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. **Career Advancement and Development** - includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.

- iii. **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.
- iv. **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*
- v. **Performance Management** - means activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success.
- vi. **New Internet Website** – means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- vii. **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.
- viii. **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.
- ix. **Small Organization** - means an obligated organization with at least one but fewer than 50 employees in Ontario, other than the Government of Ontario, the Legislative Assembly, or a designated public sector organization.
- x. **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.

- xi. **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 organizations to become compliant with two levels of the WGAG – Level A and Level AA.

Implementation:

Responsibility for the implementation of the Policy is shared between (enter departments). For more information, please see the Company’s Accessibility Plan available, on the Company’s website.

General Accessibility Standards:

I. Accessibility Plan

The Company 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 the Company’s website and will be made available in an Accessible Format upon request.

II. Training

The Company will provide training to all existing employees, volunteers, all persons who participate in the development of the Company’s AODS policies.

Training will be provided on:

- i. the requirements of the IAS.
- ii. the *Human Rights Code* as it pertains to persons with disabilities; and
- iii. the AODA Policies as required by the IAS.

The content of the training will be applicable to the individual’s duties.

Employees hired and volunteers accepted after the Compliance Deadline for Training will receive the required training as soon as practicable.

The Company will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

The Company will ensure that contractors providing goods, services and/or facilities on the Company’s behalf have received the training required under the IAS.

III. Self-Service Kiosk

The Company will have regard to the accessibility for persons with disabilities when designing, procuring, or acquiring Self-Service Kiosks.

INFORMATION AND COMMUNICATION STANDARDS

The Information and Communication Standards do not apply to:

- I.** products and product labels.
- II.** Unconvertible information or communications; and
- III.** information that the Company does not control directly or indirectly through a contractual relationship.

Should the Company determine that information or a communication is Unconvertible it will explain why and provide the person making the request with a summary of the information or communication.

I. Feedback Procedures

The Company 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.

The Company will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

II. Accessible Formats & Communication Supports

The Company will upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.

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.

The Company will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and will notify the public of the availability of same.

III. Emergency Plans, Procedures or Public Safety Information

As of January 1, 2012, The Company provides any emergency plans, procedures, or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request.

IV. Accessible Websites and Web Content

The Company ensures that, where practicable, a New Internet Website and web content on such sites(s) conforms with WCAG 2.0 Level A.

Final Website Compliance Deadline: January 1, 2021

By the Final Website Compliance Deadline, the Company 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.

When determining whether meeting the requirements of this section is practicable the Company 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.

The commitment to provide accessible websites and web content only applies to websites and web content that the Company controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

EMPLOYMENT STANDARDS

The Employment Standards only apply to employees of the Company. They do not apply to volunteers, other unpaid individuals, or contractors.

I. Recruitment/Selection/Assessment

The Company will notify the public and employees of the availability of accommodation for job applicants during the recruitment process. The Company will further notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, the Company 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.

II. Notice to Successful Applicants

The Company ensures that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

III. Informing Employees of Supports

The Company 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.

The Company 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.

All employees hired after January 1, 2016, are and will be notified of the Company's policies on supporting employees with disabilities as soon as practicable after commencing employment.

IV. Accessible Formats and Communication Supports for Employees

The Company 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.

The Company will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, the Company reserves the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.

V. Workplace Emergency Response Information

If an employee has a disability and the Company 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 the Company becomes aware of such requirement.

In such a case, with the employee's consent, the Company 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.

The Company 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 the Company reviews its general emergency response policies.

VI. Documented Individual Accommodation Plans

The Company will have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:

- i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- ii. The means by which the employee is assessed on an individual basis.
- iii. The manner in which the Company 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.
- 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.
- v. The steps the Company will take to protect the privacy of the employee's personal information.
- vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.

- vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.

Where required, an employee's individual accommodation plan will include individualized workplace emergency response information as described in section.

VII. Return to Work Process

The Company will document 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.

The return-to-work process will outline the steps the Company will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section 0VI.

VIII. Performance Management

The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.

An inclusive work environment is one where everyone is treated with respect and all employees are valued for their contributions. In an inclusive workplace, colleagues and clients are treated with dignity, respect, and equality, and these values are reflected in the organization's mission and vision. Policies and procedures are implemented and managed so that employees' rights are preserved.

IX. Career Development and Advancement

The Company takes accessibility needs of its employees with disabilities into account, as well as any individual accommodation plans, when providing

opportunities for career development and advancement to its employees with disabilities.

X. Redeployment

The Company takes the accessibility needs of its employees with disabilities into account, as well as individual accommodation plans, when redeploying employees with disabilities.

Questions About This Policy

For more information about the Policy please contact:

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