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Reviewer: Claire Chester Julie Horne Terry Collins Maria Dimson Sameer Singh	Original Date October 26, 2022
Approver: Abby Katz Starr	Next Review Date October 26, 2023

# Integrated Accessibility Standards Policy - 1003

## Policy Statement of Organizational Commitment:

The Unionville Home Society (UHS) is committed to the full inclusion, equal access, and participation of persons 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.

Accordingly, the UHS will take steps to facilitate the identification, removal, and prevention of barriers to persons with disabilities to ensure access to our campus's services, employment, buildings, structures.

## Policy

This policy provides the overarching framework to comply with the Integrated Accessibility Standards Regulation developed under the Accessibility for Ontarians with Disabilities Act, 2005 (the AODA).

Under the AODA, the *Integrated Accessibility Standards Regulation* (the "IASR") establishes standards to address barriers that people with disabilities face in the areas of:

- 1. General Requirements (Procurement, Training and Policy)
- 2. Information and Communication
- 3. Customer Service
- 4. Employment
- 5. Transportation
- 6. Built Environment and Public Spaces

## **1.** General Requirements

UHS will ensure the general requirements of the IASR under the AODA are met in order to achieve accessibility for persons with disabilities.

#### **1.1 Accessibility Policies**



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The AODA requires organizations to maintain one or more policies governing how the organization will achieve the requirements of the IASR and make such documents available to the public, and in accessible formats upon request.

#### 1.2 Multi-Year Accessibility Plan

The AODA requires the UHS create a multi-year accessibility plan, outlining strategies to identify and remove and prevent barriers and for it to be reviewed regularly.

#### 1.3 Procurement of Goods, Services and Facilities

When required UHS will make every effort to incorporate accessibility criteria and features, into all facilities related procurements and or new builds in addition to adhering to the accessibility requirements under the Ontario Building Code.

#### 1.4 Training

We are committed to training staff and volunteers in Ontario's accessibility laws and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

We will train our employees and volunteers on accessibility as it relates to their specific roles.

Training will include:

- A review of the purpose of the AODA
- Requirements of AODA Standards under the IASR
- The Ontario Human Rights Code as it pertains to persons with disabilities.
- Accessible Customer Service.

## 2. Information and Communication Requirements

We will communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports.

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



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#### 2.1 Notice of Availability of Documents

This Policy will be made available on the UHS' website and must be provided to individuals, upon request, in the appropriate format or with communication supports.

### 2.2 Accessible Websites and Web Content

The AODA requires that the UHS website and web content, must conform to Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, as of January 1, 2021.

### 2.3 Feedback

UHS will have a process in place for receiving and responding to feedback, on how services are delivered to people with disabilities and will make this process accessible. Feedback about the Unionville Home Society's delivery of goods and services to persons with disabilities may be given by telephone, in person in writing in electronic form or through other methods.

Information about the feedback process will be available on the Unionville Home Society website (<u>www.uhs.on.ca</u>) and/or in other appropriate locations.

# **3. Customer Service Requirements**

The Unionville Home Society will use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Unionville Home Society's services are provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of the Unionville Home Society's services to persons with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person with a disability to obtain use or benefit from the Unionville Home Society's goods and services.
- Persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain use or benefit from the Unionville Home Society's services.

### 3.1 Assistive Devices

A person with a disability may provide their own assistive device for the purpose of obtain, using or benefitting from the UHS goods and services, unless said device may pose a risk to the health and safety of themselves or others, in which case the Unionville Home Society may offer a person with a disability other reasonable measures to assist them.

### 3.2 Support Persons



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Where a person with a disability accessing UHS' services, or facilities is accompanied by a support person, UHS will endeavour to permit the support person together and will make every effort to not prevent them from having access to the support person while on the premises.

#### 3.3 Service Animals

If a person with a disability is accompanied by a guide dog or **other service animal**, the provider of goods or services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises. In the event the animal is excluded by law, such as in a food preparation area, UHS must ensure other measures are available to enable the person with a disability to obtain services, and facilities. It is the responsibility of the person with a disability to ensure that their service animal is in good health and does not pose a risk to the health and safety of others and is under their care and control at all times.

### 3.4 Notice of Service Disruptions

UHS will give notice, as soon as possible, of any temporary planned or unplanned service disruption of facilities, services or systems that are relied upon by individuals with disabilities to access UHS' goods, services, or facilities, such as elevators, lifts, or accessible washrooms etc.

## 4. Employment Standards Requirements

The UHS will foster an inclusive workforce and provide equitable treatment and accommodation to ensure barrier-free employment.

#### 4.1 Recruitment, Assessment and Selection Process

UHS will post information about the availability of accommodations for applicants with disabilities in its recruitment process. If accommodations are requested, UHS will consult with the individual and will provide or arrange for the provision of a suitable accommodation in a timely manner that considers the applicant's accessibility needs due to disability. Successful applicants will be notified about the UHS's policies for accommodating employees with disabilities as part of their offer of employment.

### 4.2 Employee Supports

UHS employees will be made aware of the policies used to support employees with disabilities and accommodations available and will be provided to new employees through employment agreements and orientation materials.

### 4.3 Accessible Formats and Communication Supports for Employees



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In accordance with legislation, upon an employee's request, UHS will provide or arrange for the provision of accessible formats and communication supports.

### 4.4 Workplace Emergency Response Information

The UHS will provide individualized emergency response information to employees who identify potential accessibility barriers when responding to emergency situations.

### 4.5 Individual Accommodation Plans (under development)

The UHS's Accommodation Policy describes the mandatory process for the development and maintenance of documented individual accommodation plans to support employees with disabilities.

### 4.7 Performance Management, Career Development, and Redeployment

The UHS will ensure employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management and redeployment opportunities.

# 5. Transportation Standards

Although UHS is not directly responsible for transportation requirements, we will make every effort to ensure that Vehicles-for-Hire (Shuttles, Taxis and Ride-sharing Services) that are used for residents, their families and staff are compliant.

# 6. Built Environment and Public Spaces Requirements

The UHS will ensure accessibility at all its facilities and public spaces by designing with accessibility in mind, including but not limited to:

- Buildings and facilities
- Outdoor recreation spaces and paths of travel like ramps, stairs etc.
- Parking spaces
- Outdoor public eating spaces
- Service-related elements such as a reception counter and waiting area

UHS will ensure preventative and emergency maintenance of accessible elements in public spaces in a timely fashion.

## 7 Accountabilities of Employees of Unionville Home Society

### 7.1 Employees, Volunteers and Third Parties



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All employees and other persons acting on behalf of the UHS shall:

- Have thorough knowledge of and maintain compliance with this Policy.
- Be familiar with their rights and responsibilities under this Policy.
- prevent accessibility barriers by including accessibility considerations in the development of goods, services, and facilities.
- Participate in identifying accessibility barriers and planning for barrier removal.
- provide a welcoming environment for people with disabilities, including any person with a disability using assistive devices or accompanied by a support person or service animal.
- Communicate with persons with disabilities in a manner that considers their disability.
- Provide information and communications in accessible formats upon request, or with communication supports, consulting with the requestor about their preferred format.
- Facilitate the process of receiving and responding to feedback about the manner that the UHS provides goods, services, and facilities to persons with disabilities, and ensure all feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports upon request.
- Facilitate requests for accommodation by members of the public and employees with disabilities in a timely manner, to the point of undue hardship, in accordance with the *Ontario Human Rights Code* and the UHS's Accommodation Policy
- When serving customers that have competing accommodation needs, staff will make every effort to meet the needs of all individuals according to *Ontario Human Rights Code* and the UHS's relevant policies.
- Attend mandatory training and any additional training appropriate to the duties of their role, which may include acquiring skills and competencies necessary to identify, prevent and remove accessibility barriers. Training may also include how to use and maintain assistive devices and technologies.

### 7.2 Managers and Directors

In addition to the roles and responsibilities in Section 7.1 of this Policy, individuals with management and supervisory roles shall:

- Provide leadership in building an inclusive and accessible environment for residents, their families, and our employees and volunteers.
- Facilitate requests for accommodation by members of the residents, their families, and our employees and volunteers with disabilities in a timely manner, to the point of undue hardship, in accordance with the *Ontario Human Rights Code* and the UHS's relevant policies.
- Prevent barriers by including accessibility considerations in the development of new policies, practices, procedures, or bylaws, including use of the Equity Lens tool.
- Ensure that the Policy is communicated to all UHS employees and those acting on behalf of the UHS.
- Promote awareness of the Policy within their area of responsibility.



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• Monitor current practices and ensure that management and staff are held accountable for their responsibilities under the Policy.

- Act on non-compliant issues within their area of responsibility.
- Attend training and ensure staff receive training appropriate to the duties of their role, including any skills and competencies required to identify, prevent, and remove accessibility barriers.
- Ensure volunteers and other third parties providing services on behalf of the UHS have been provided training, either by the UHS or their own organization

#### 4.3 UHS Executive and Board Members

In addition to roles and responsibilities in Sections 7.1 and 7.2 of this Policy, the UHS Executive and Board shall:

- Ensure resources are budgeted for identifying and preventing accessibility barriers (including attitudinal, systemic, information, communications, and technology, and built environment and public space barriers) and for planning for barrier removal.
- Provide oversight for implementation of this Policy and compliance with AODA within area of responsibility.
- Provide AODA compliance assurance when required.

## Definitions

#### **Assistive Device**

A device used to assist persons with disabilities in carrying out activities or in accessing services.

#### Barrier

Defined by the AODA as anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice.

#### **Communications Supports**

Includes, but is not limited to, captioning, alternative, and augmentative communications supports, plain language, sign language and other supports that facilitate effective communications.

#### Disability

"Disability" is defined, per Section 2 of the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Human Rights Code, R.S.O. 1990, c. H.19, as follows:

(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,



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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.

#### **Service Animal**

Any animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to their disability; or where the person provides a letter from a regulated Health Professional confirming that the animal is required for reasons relating to their disability.

#### **Support Person**

A person who accompanies a person with a disability in order to assist them with communication, mobility, personal care, or medical needs or with access to goods or services. This person can be a paid support worker, a volunteer, a friend, or a family member.