



# Greenwood

## RETIREMENT COMMUNITIES

---

## A 2.10 Integrated Accessibility Standards

### **1. PURPOSE**

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with disabilities.

The *Integrated Accessibility Standards* (the “IAS”) is a regulation under the Act the purpose of which is to ensure accessibility for persons with disabilities in the areas of (i) Information and Communication, (ii) Employment, (iii) Transportation and (iv) Design of Public Spaces.

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

### **2. STATEMENT OF COMMITMENT**

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

### **3. 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 Greenwood Retirement Communities and
- iii. persons responsible for the development of Greenwood Retirement Communities 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.

#### 4. 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 Greenwood Retirement Communities to become compliant with two levels of the WCAG - Level A and Level AA.

## **5. IMPLEMENTATION**

Responsibility for the implementation of the Policy is shared between all departments.

## **6. GENERAL ACCESSIBILITY STANDARDS**

### **I. Accessibility Plan**

#### ***Compliance Deadline: January 1, 2014***

Greenwood Retirement Communities has established and implemented an Accessibility Plan, which outlines the Company's strategy to prevent and remove barriers for persons with disabilities and meet the requirements of the IAS in accordance with the timelines set out therein.

Greenwood Retirement Communities 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.

### **II. Training**

#### ***Compliance Deadline: January 1, 2015***

By January 1, 2015 (the "Compliance Deadline for Training"), Greenwood Retirement Communities will provide training to all existing employees, volunteers and all persons who participate in the development of AODA 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.

Greenwood Retirement Communities 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.

Greenwood Retirement Communities 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**

#### ***Compliance Deadline: January 1, 2014***

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

## **7. 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 Greenwood Retirement Communities does not control directly or indirectly through a contractual relationship.

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

### **I. Feedback Procedures**

***Compliance Deadline: January 1, 2015***

By January 1, 2015 Greenwood Retirement Communities 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.

Greenwood Retirement Communities will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

### **II. Accessible Formats & Communication Supports**

***Compliance Deadline: January 1, 2016***

By January 1, 2016 Greenwood Retirement Communities 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.

Greenwood Retirement Communities will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support.

### **III. Emergency Plans, Procedures or Public Safety Information**

***Compliance Deadline: January 1, 2012***

Greenwood Retirement Communities will provide 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**

***Initial Website Compliance Deadline: January 1, 2014***

***Final Website Compliance Deadline: January 1, 2021***

By the Initial Website Compliance Deadline Greenwood Retirement Communities will ensure that, where practicable, a New Internet Website and web content on such site(s) conforms to WCAG 2.0 Level A.

By the Final Website Compliance Deadline Greenwood Retirement Communities will ensure that, where practicable, any website or content on that site(s) published after January 1, 2014 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 Greenwood Retirement Communities 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 Greenwood Retirement Communities controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

#### **8. EMPLOYMENT STANDARDS**

The Employment Standards only apply to employees of Greenwood Retirement Communities. They do not apply to volunteers, other unpaid individuals or contractors.

##### **I. Recruitment/Selection/Assessment**

***Compliance Deadline: January 1, 2016***

By January 1, 2016 Greenwood Retirement Communities will notify the public and employees of the availability of accommodation for job applicants during the recruitment process.

Greenwood Retirement Communities will further notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request in relation to the assessment or selection process, if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, Greenwood Retirement Communities 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**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016 Greenwood Retirement Communities will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

## **III. Informing Employees of Supports**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016 (the “Informing Employees of AODA Policies Compliance Deadline”) Greenwood Retirement Communities 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.

Greenwood Retirement Communities 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 the Informing Employees of AODA Policies Compliance Deadline will be notified of Greenwood Retirement Communities policies on supporting employees with disabilities as soon as practicable after commencing employment.

## **IV. Accessible Formats and Communication Supports for Employees**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016 Greenwood Retirement Communities 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.

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

## **V. Workplace Emergency Response Information**

### ***Compliance Deadline: January 1, 2012***

If an employee has a disability and Greenwood Retirement Communities 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 Greenwood Retirement Communities becomes aware of such requirement.

In such a case, with the employee's consent, Greenwood Retirement Communities 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.

Greenwood Retirement Communities 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 Greenwood Retirement Communities reviews its general emergency response policies.

## **VI. Documented Individual Accommodation Plans**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016, Greenwood Retirement Communities 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 Greenwood Retirement Communities 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 Greenwood Retirement Communities 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 V (Workplace Emergency Response Information) above and s.27 of the IAS.

## **VII. Return to Work Process**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016, Greenwood Retirement Communities will have documented 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 Greenwood Retirement Communities will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section 8V.

## **VIII. Performance Management**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016, Greenwood Retirement Communities will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

## **IX. Career Development and Advancement**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016, Greenwood Retirement Communities 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.

## **X. Redeployment**

### ***Compliance Deadline: January 1, 2016***

By January 1, 2016, Greenwood Retirement Communities will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

## **9. DESIGN OF PUBLIC SPACES STANDARDS**

Greenwood Retirement Communities 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. For further information on existing or planned projects to redevelop or construct new public spaces see Greenwood Retirement Communities Accessibility Plan.



## **10. QUESTIONS ABOUT THIS POLICY**

For more information about the Policy or Greenwood Retirement Communities Accessibility Plan please contact:

**Greenwood Retirement Communities**  
**2200 Yonge Street, Suite 805**  
**Toronto, Ontario M4S 2C6**  
**Telephone: (416) 849 5030 Fax: (416) 849 5031**  
**E-mail: [info@greenwoodrc.com](mailto:info@greenwoodrc.com) [www.greenwoodrc.com](http://www.greenwoodrc.com)**

Accessible formats of this document are available free upon request from:

**Greenwood Retirement Communities**  
**2200 Yonge Street, Suite 805**  
**Toronto, Ontario M4S 2C6**  
**Telephone: (416) 849 5030 Fax: (416) 849 5031**  
**E-mail: [info@greenwoodrc.com](mailto:info@greenwoodrc.com) [www.greenwoodrc.com](http://www.greenwoodrc.com)**