

St. Andrew's Residence, Chatham

Operations Manual



SUBJECT: Integrated Accessibility Standards	SECTION: Administration
POLICY NO: A34	REGULATION: AODA 2005
EFFECTIVE DATE: June 12, 2023	REVISION DATE: June 16, 2023

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, (iv) Design of Public Spaces and (v) Customer Service.

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

For a more detailed explanation of the St. Andrew's Residence strategy to prevent and remove barriers for persons with disabilities please refer to St. Andrew's Residence Multi-Year Accessibility Plan (“the “Accessibility Plan”) which is available on the St. Andrew's Residence website at www.standrewsresidence.com.

2. STATEMENT OF COMMITMENT

St. Andrew's Residence 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 St. Andrew's Residence; and
- iii. persons responsible for the development of St. Andrew's Residence 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. **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.
- viii. **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 St. Andrew's Residences 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 Management Team Members. For more information please see the St. Andrew's Residence Accessibility Plan available on the website (www.standrewsresidence.com).

6. GENERAL ACCESSIBILITY STANDARDS

I. Accessibility Plan

St. Andrew's Residence 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.

St. Andrew's Residence 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 St. Andrew's Residence website and will be made available in an Accessible Format upon request.

II. Training

St. Andrew's Residence provides training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.

Training is provided on:

- a) the requirements of the IAS;
- b) the *Human Rights Code* as it pertains to persons with disabilities; and
- c) the AODA Policies as required by the IAS.

The content of the training is applicable to the individual's duties.

Employees hired and volunteers accepted will receive the required training during their job orientation or as soon as practicable.

St. Andrew's Residence 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.

St. Andrew's Residence will ensure that contractors providing goods, services and/or facilities on the Company's behalf have received the training required under the IAS (if applicable).

St. Andrew's Residence provides training in respect of any changes to the policies described in a, b and c above on an ongoing basis.

III. Self-Service Kiosks

St. Andrew's Residence 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

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- iii. information that St. Andrew's Residence does not control directly or indirectly through a contractual relationship.

Should St. Andrew's Residence 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

St. Andrew's Residence ensures 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.

St. Andrew's Residence will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

II. Accessible Formats & Communication Supports

St. Andrew's Residence 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.

St. Andrew's Residence 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

St. Andrew's Residence 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

Final Website Compliance Deadline: January 1, 2021

St. Andrew's Residence ensures that, where practicable, the Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

By the Final Website Compliance Deadline St. Andrew's Residence 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 St. Andrew's Residence 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 St. Andrew's Residence 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 St. Andrew's Residence. They do not apply to volunteers, other unpaid individuals or contractors.

I. Recruitment/Selection/Assessment

St. Andrew's Residence notifies the public and employees of the availability of accommodation for job applicants during the recruitment process.

St. Andrew's Residence further notifies 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, St. Andrew's Residence 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

St. Andrew's Residence 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

St. Andrew's Residence informs 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.

St. Andrew's Residence provides 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 all St. Andrew's Residence policies on supporting employees with disabilities as soon as practicable after commencing employment.

IV. Accessible Formats and Communication Supports for Employees

St. Andrew's Residence 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.

St. Andrew's Residence will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, St. Andrew's Residence 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 St. Andrew's Residence 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 St. Andrew's Residence becomes aware of such requirement.

In such a case, with the employee's consent, St. Andrew's Residence 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.

St. Andrew's Residence 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 St. Andrew's Residence reviews its general emergency response policies.

VI. Documented Individual Accommodation Plans

St. Andrew's Residence 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 St. Andrew's Residence 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 St. Andrew's Residence 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.

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- 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

St. Andrew's Residence 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 St. Andrew's Residence 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

St. Andrew's Residence 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

St. Andrew's Residence 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

St. Andrew's Residence 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

St. Andrew's Residence 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 the St. Andrew's Residence Accessibility Plan.

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10. QUESTIONS ABOUT THIS POLICY



For more information about the Policy or the St. Andrew's Residence Accessibility Plan please contact:

Jessica Smith, Executive Director
Phone: 519-354-8103, Ext. 224

11. REFERENCE AND RELATED STATEMENT OF POLICY AND PROCEDURE

- I. A33-Customer Service Standards
- II. A36-Return to Work Process
- III. A37-Accommodation Plan Process
- IV. A25-STAR Multi-Year Accessibility Plan
- V. Integrated Accessibility Standards
- VI. Ontario Human Rights Code
- VII. AODA, 2005

Date	Revision	Effective
Sept., 2016	New	Sept. 26, 2016
Oct. 7, 2019	Added Customer Service to second paragraph, Removed Compliance Deadlines throughout as the dates have passed. Removed Director of Operations and replaced	Oct. 10, 2019
Dec. 3, 2019	As per AODA Added the following on pg. 3 At 6 II added: St. Andrew's Residence provides training in respect of any changes to the policies described in a, b and c above on an ongoing basis. At 6 III added Self Service Kiosks: St. Andrew's Residence will have regard to the accessibility for persons with disabilities when designing, procuring or acquiring Self-Service Kiosks.	Dec. 6, 2019
May 10, 2021	Policy reviewed, no changes recommended	May 10, 2021
June 12, 2023	Policy review, no changes recommended	June 16, 2023

Recommended By:  Approved By: 

Title: Christine Elliott
Director of Administration

Title: Glen Norton
Interim Executive Director