

KNOLLCREST LODGE		POLICY & PROCEDURE	
Department: HUMAN RESOURCES	Category:	Approval: CEO	
Subject: ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES (AODA)			
Effective Date: JANUARY 2012	Revision Date(s): NOVEMBER 2024	Page	1 of 4

POLICY OVERVIEW:

Knollcrest Lodge, (the “Organization”) is committed to providing excellent service and support to all persons, including those with disabilities. Our goal is to focus on identifying, removing, and preventing barriers for persons with disabilities. This policy applies to all employees, students, volunteers, and others who provide goods or services on behalf of the Organization. This policy complies with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) (the “Act”).

PURPOSE:

This policy has been developed in accordance with the Integrated Accessibility Standards Regulations (IASR) and addresses how the Organization will achieve accessibility. It provides the overall strategic direction that the Organization will follow to provide accessibility supports to Ontarians with disabilities.

This document records the Organization’s policies with respect to the Act but recognizing that the Organization plans to implement the measures included in this policy, at the latest, in accordance with the compliance schedule provided by the IASR, or as soon as possible.

FOUR GUIDING PRINCIPLES

The Organization is committed to ensuring that its policies, practices, and procedures are aligned with the following core principles, as outlined in the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

- **Dignity.** Ensure persons with disabilities are provided with services in a manner that will allow them to maintain self-respect and the respect of others.
- **Independence.** Ensure persons with disabilities have the right to work on their own and can-do things in their own way.
- **Integration.** Ensure persons with disabilities fully benefit from the same goods and services, in the same place and in the same or comparable manner as others. This may require alternative formats and flexible approaches. It means complete and full participation.
- **Equal Opportunity.** Ensure persons with disabilities have the same chances, options, benefits, and results as others.

DEFINITIONS

For the purpose of this policy ‘**disability**’ is defined according to the *Accessibility for Ontarians with Disabilities Act, 2005*, as:

- 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, physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- a condition of mental impairment of developmental disability;
- learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols of spoken language,
- a mental disorder; or,
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Work Safety and Insurance Act, 1997*.

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INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS (IASR)

The Integrated Accessibility Standards Regulations (IASR) are a grouping of standards that the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) has developed and implemented to break down barriers and increase accessibility for persons with disabilities. The Integrated Accessibility Standards Regulations (IASR) consist of four principal areas that are applicable to the Organization, which are:

- Information and Communication Standards
- Employment Standards
- Customer Service Standards
- Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

PROCEDURE:

INFORMATION & COMMUNICATION STANDARDS

- **Feedback.** The Organization will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.
- **Accessible Formats and Communication Supports.** Upon request, the Organization will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that considers the person's accessibility needs due to disability. The Organization will consult with the person making the request in determining the suitability of an accessible format or communication support. The Organization will also notify the public about the availability of accessible formats and communication supports.
- **Accessible Websites and Web Content.** The Organization will make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially Level A and increasing to Level AA, in accordance to the schedule set out in this section of the regulation.

EMPLOYMENT STANDARDS

- **Recruitment, Assessment, and/or Selection Process.** The Organization will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. The Organization will notify job applicants, when they are individually selected to participate further in an assessment or selection process, that accommodation is available upon request in relation to the materials or processes to be used. If a selected applicant requests accommodation, we will consult with the applicant and provide, or arrange for the provision of suitable accommodation in a manner that considers the applicant's needs due to disability
- **Notice to Successful Applicants.** When making offers of employment, the Organization will notify the successful applicant of its policies for accommodating employees with disabilities.
- **Informing Employees of Supports.** The Organization will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that considers an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.
- **Accessible Formats and Communications Supports for Employees.** Upon the request of an employee with a disability, the Organization will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform their job and information that is available to other employees. In determining the suitability of an accessible format or communication support, we will consult with the employee making the request.

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- **Workplace Emergency and Fire Evacuation Procedure Information.** If applicable, the Organization will provide individualized workplace emergency and fire evacuation procedure information to employees who have a disability. If the disability is such that the individualized information is necessary, and if the Organization is aware of the need for accommodation due to the employee's disability, we will provide this information as soon as practicable after becoming aware of the need for accommodation. Where the employee requires assistance, the Organization will, with the consent of the employee, provide the workplace emergency and fire evacuation procedure information to the person designated by the Organization to aid the employee. The Organization will review the individualized workplace emergency and fire evacuation procedure information for each site, and when the employee's overall accommodation needs/plans are reviewed.
- **Performance Management, Career Development, and Advancement/Redeployment.** The Organization will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees or when redeploying employees.
- **Documented Individual Accommodation Plans.** The Organization has a process in place for the development of documented individual accommodation plans for employees with disabilities. This process includes the following elements:
 - The way an employee requesting accommodation can participate in the development of the individualized accommodation plan.
 - The means by which an employee is assessed on an individual basis.
 - The way the Organization can request an evaluation by an outside an outside medical/other expert, at the Organization's expense, to assist the Organization in determining if accommodation can be provided and, if so, how accommodation can be provided.
 - The steps taken to protect the privacy of the employee's personal information.
 - The frequency with which the individual accommodation plan will be reviewed and updated and the way it will be done.
 - If an individual accommodation plan is denied, the reason for the denial will be provided to the employee.
 - The means of providing the individual accommodation plan in a format that considers the employee's accessibility needs due to disability.

Documented individual accommodation plans will:

- If requested, include any information regarding accessible formats and communications supports provided, as required by the Standard;
- If required, include individualized workplace emergency response information, as required in the Standard; and
- Identify any other accommodation that is to be provided.

CUSTOMER SERVICE STANDARDS

ASSISTIVE DEVICES

Knollcrest Lodge welcomes persons with disabilities to use their own personal assistive devices to obtain, use or benefit from services offered by the Organization.

Should a person with a disability be unable to access the Organization's services through the use of their own personal assistive device, Knollcrest Lodge will ensure the following measures are taken;

- Assess service delivery and potential service options to meet the needs of the individual; and

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- Identify alternative services and how a person with a disability can access the services, either temporarily or on a permanent basis.

Further, the Organization will ensure staff are aware of and become familiar with the use of assistive devices available for their customers at the location(s) in which they provide service.

USE OF SERVICE ANIMALS AND SUPPORT PERSONS

Use of Service Animals. The Organization is committed to welcoming persons with disabilities and their service animals to the parts of our premises that are open to the public and other third parties and will permit the person to keep the service animal with them. The Organization will also ensure that all persons to whom this policy applies have been trained on how to interact with persons with disabilities who are accompanied by a service animal. If the service animal is excluded by law from the Organization premises, the Organization shall ensure that measures are available to permit persons with disabilities to access goods and services through other means. A service animal means a “guide dog” as defined by the Blind Persons Rights Act, or any other animal if:

- The animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, because of visual indicators such as the vest or harness worn by the animal; or
- If the person provides a letter from a regulated health professional listed below confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario
 - A member of the College of Physicians and Surgeons of Ontario
 - A member of the College of Chiropractors of Ontario
 - A member of the College of Physiotherapists of Ontario
 - A member of the College of Nurses of Ontario
 - A member of the College of Psychologists of Ontario
 - A member of the College of Occupational Therapists of Ontario
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario
 - A member of the College of Optometrists of Ontario

Use of Support Persons. A support person means, in relation to a person with a disability, another person who accompanies the person with a disability to assist with communication, mobility, personal care, or medical needs or with access to goods or services. The person in question need not be a person who is paid for such support services to be considered a “support person.” The Organization is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the Organization’s premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on the Organization premises. If a fee is charged in relation to a support person’s presence on the Organization premises, advanced notice of the fee will be provided. On occasion, persons with disabilities require the assistance of a support person. If necessary, the Organization may require a person with a disability to be accompanied by a support person while on the Organization premises, but only if, after consulting with the person with a disability and considering the available evidence, the Organization determines that, a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of

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others on the premises. If the Organization requires a person with a disability to be accompanied by a support person when on the premises, the Organization will waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.

TRAINING FOR STAFF

The Organization will provide training on the requirements of the accessibility standards in the IASR and on the Human Rights Code as it pertains to persons with disabilities to:

- All employees and volunteers (if applicable);
- All persons who participate in developing the Organization's policies; and

All other persons who provide goods, services, or facilitates on behalf of the Organization

Training will be provided to all members of our organizations including: employees, volunteers, students, and other persons. This training will be provided as a condition of employment to all new staff and on an on-going basis for staff to ensure all staff stays current with any policy or procedural changes as it relates to the AODA.

The Organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.

Training may be available in accessible formats and in multiple formats. (i.e. in class sessions, presentations, brochures, etc.)

The training will include:

- The purposes of the *Accessibility for Ontarians with Disabilities Act, 2005*
- The requirements of the Accessibility Standards for Customer Service relating to interacting and communicating with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the assistive devices available on the premises that may assist with the provision of goods or services to people with disabilities
- What to do if a person with a disability is having difficulty accessing goods and services provided by the Organization
- Current policies, practices and procedures relating to the customer service standard

FEEDBACK PROCESS

The ultimate goal of this Organization is to meet and surpass client/customer expectations while serving customers with disabilities. Comments on the services regarding how well those expectations are being met are welcomed and appreciated.

- Feedback process will be available in an accessible format upon request.
- Feedback concerns regarding the way this organization provides goods and services to people with disabilities can be made by contacting the Knollcrest CEO.
- A response back to the customer that the concern has been received will be provided within five (5) business days.
- Acknowledgement regarding the outcome will follow within ten (10) business days of receiving the concern.
- Comments can be provided by email, verbally, in writing or in person by setting up an appointment.

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DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT)

Knollcrest Lodge will comply with the Design of Public Spaces Standards in circumstances where it qualifies as an obligated organization under the Act and constructs or redevelops any public space to which the Act applies.

Additionally, the Organization’s policies for preventative and emergency maintenance will apply equally to the accessible elements of any public spaces within our built environment to which the Act applies.

Where accessible elements attached to any public spaces to which the Act applies are not in working order due to temporary disruptions, the Organization will comply with the “Notice of Temporary Disruption.” The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

ACCOMMODATION IN THE WORKPLACE

Accommodation will be provided in accordance with the principles of dignity, individualization, and inclusion. The Organization will work cooperatively, and in a spirit of respect, with all partners in the accommodation process. This policy applies to all parties acting on behalf of the Organization (i.e., employees, volunteers, contractors, sub-contractors, etc.) and applies to all aspects of the employment relationship, including recruitment and selection, promotions and transfers, discipline, and conditions of work (i.e., leaves of absence, hours of work, etc.).

Accommodation Request Process

HR is responsible for dealing with all requests for accommodation and will keep the CEO apprised of any accommodation requests. Accommodation requests should, when possible, be made in writing. The accommodation request should indicate the following:

- The nature of the request for accommodation.
- The reason accommodation is required, which includes enough information to confirm the existence of a need for accommodation.
- Any other information to confirm the existence of the need for accommodation and the measures of accommodation required.

All accommodation requests will be taken seriously, and no person will be penalized for making an accommodation request. The person responsible for dealing with the accommodation request will do so in a timely way. This may include seeking external help from professionals experienced in determining the appropriate accommodation. Several accommodation strategies may be used to fulfill the Organization’s obligation. In the interest of both prompt attention to the needs of an individual and the need to explore the utility of various accommodation strategies, an interim or experimental strategy may be implemented.

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Undue Hardship

Accommodation will be provided to the point of undue hardship, as defined by the Ontario Human Rights Commission’s Policy and Guidelines on Disability and the Duty to Accommodate. A determination regarding undue hardship will be based on an assessment of costs, outside sources of funding, and health and safety. It will be based on objective evidence. A determination that

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accommodation will create undue hardship may only be made by the Organization. In determining undue hardship, the Organization will only consider the following factors:

- Cost
- Outside sources of funding (if any)
- Health and safety requirements (if any)

Where a determination is made that accommodation would create undue hardship, the person requesting accommodation will be given written notice, including the reasons for the decision and the objective evidence relied upon. The accommodation seeker shall be informed of his or her recourse under the Ontario Human Rights Code.

AVAILABILITY OF THE ORGANIZATION'S AODA POLICY

In accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), this policy will be made available to any person upon request.

Review and amendments of this document will be the responsibility of the CEO.