Assisted Living Southwestern Ontario

Accessibility for Ontarians with Disabilities Act

Multi-Year Accessibility Plan 2021 to 2025 and Associated Policies

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Assisted Living Southwestern Ontario

Assisted Living Southwestern Ontario's mission is to provide adults with physical disabilities with services that ensure they are able to live, work and play in the community with choice, opportunities, and the confidence of full citizenship.

Assisted Living Southwestern Ontario - Principles of Service

- We respect and encourage autonomy by offering a full range of services to support independent living by our consumers;
- We recognize and value the uniqueness of individuals by ensuring our services are self-directed according to individual needs;
- We provide flexible services that support individuals to live up to their full potential;
- We reduce physical barriers for our consumers;
- We promote acceptance and tolerance among people;
- We provide a safe environment for our consumers and staff;
- We behave with the utmost honesty and integrity and ensure our hiring practices support these values;
- We are accountable for meeting the needs of our consumers in a financially prudent manner, which does not compromise service quality; and
- We work collaboratively with other service providers and our community.

The Accessibility for Ontarians with Disabilities Act

In 2005, the Ontario Government passed the *Accessibility for Ontarians with Disabilities Act* (AODA) with the goal to make Ontario fully accessible in all aspects of daily living by 2025.

Accessibly standards have been created as part of the AODA. These standards are rules that businesses and organizations in Ontario need to follow to identify, remove and prevent barriers to ensure people with disabilities have more opportunities to participate in everyday life.

Ontario combined multiple standards (e.g., Information and Communications Standards, Employment standards and Transportation standards) into a single regulation called the Integrated Accessibility Standards Regulation (IASR). This regulation has been passed into law and the requirements were phased in between 2012 and 2021. This Multi-Year Accessibility Plan satisfies Assisted Living Southwestern Ontario's requirements under the IASR.

Statement of Commitment to Champion Accessibility

Assisted Living Southwestern Ontario is committed to treating all people in a way that allows them to maintain their dignity, independence, integration and equal opportunity. Assisted Living is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. Assisted Living Southwestern Ontario is committed to integration, and to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA. An assessment of Assisted Living Southwestern Ontario's previously existing policies and procedures relating to accessibility was performed in order to inform the development of Assisted Living Southwestern Ontario's Multi-Year Accessibility Plan.

Assisted Living Southwestern Ontario's Multi-Year Accessibility Plan will be reviewed and fully-updated by Assisted Living Southwestern Ontario at least once every five years or when there are amendments to the AODA, its associated regulations or changes to Assisted Living Southwestern Ontario's accessibility services and/or policies.

Assisted Living Southwestern Ontario understands that the IASR does not replace or affect existing legal obligations under the Ontario Human Rights Code and other superseding laws in respect to accommodation of people with disabilities. Assisted Living Southwestern Ontario will comply with the Ontario Human Rights Code, the AODA and associated regulations, including the IASR and Accessible Customer Service Standard. Assisted Living Southwestern Ontario respects people's privacy and personal information, and will not share a person's information unless it is appropriate with consent, required or legally obligated.

Establishment and Continuation of Accessibility Policies and Plans

As of July 1, 2015 Assisted Living Southwestern Ontario completed and continues to fulfill the following endeavours:

- Develop, implement and maintain corporate policies governing how the organization will achieve accessibility;
- Establish, implement and maintain a Multi-Year Accessibility Plan, which was reviewed and updated as of December 2020 and again in December 2023;
- Include within its Multi-Year Accessibility Plan a statement of commitment to meet the accessibility needs of persons with disabilities in a timely manner; and
- Make the corporate polices and Multi-Year Accessibility Plan available to the public on Assisted Living Southwestern Ontario's website and available in accessible formats upon request.

Note: General accessibility policies are also found in Assisted Living Southwestern Ontario's Customer Service Plan, and can be accessed via Assisted Living Southwestern Ontario's website or provided in an accessible format upon request. Only sections applicable to Assisted Living Southwestern Ontario will be found in this Multi-Year Accessibility Plan, please see "A Guide to Integrated Accessibility Standards Regulation" on the Ontario Government's website for a detailed breakdown of all of the IASR's standards, sections and requirements. Deadlines included in this Multi-Year Accessibility Plan are in accordance with deadlines outlined the IASR or are internal deadlines that are earlier dates than outlined in the IASR.

Accessible Emergency Information

Assisted Living Southwestern Ontario is committed to providing the consumers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Training

Assisted Living Southwestern Ontario provides training to employees on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training is provided in a way that best suits the duties of employees. Assisted Living Southwestern Ontario has implemented steps to ensure employees are provided with the training needed to meet the requirements that came into effect January 1, 2015.

- Provide training to existing staff during staff meetings
- Provide e-training to new hires as part of their orientation

Information and Communication Standards

- a) Emergency Procedure, Plans or Public Safety Information Information that is prepared by Assisted Living Southwestern Ontario and made available to the public will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.
- b) Accessible Websites and Web Content
 Assisted Living Southwestern Ontario will continue to endeavour
 to ensure that all new websites or significant refreshes to an
 existing website and all content on that website that has been
 posted conforms to the Web Content Accessibility Guidelines 2.0,
 Level A and WCAG 2.0 Level AA, except for exclusions set out in
 the IASR. Assisted Living Southwestern Ontario will continue to
 review its website(s) on a regular basis and make best efforts to
 improve website accessibility. If there is content posted on our

website(s) that is not accessible due to software limitations, or if content is too complex to be accessible, we will provide such content in an accessible format, even if it is outside our website(s).

- c) Feedback, Accessible Formats
 Assisted Living Southwestern Ontario will continue to identify any barriers in our existing feedback processes and remove those barriers to ensure they are accessible to people with disabilities upon request.
- d) Accessible Formats and Communication Supports

 Assisted Living Southwestern Ontario will continue to ensure that all of our publicly available information is made accessible upon request. Where a request for an accessible format or for communication supports is received, we will consult with the individual making the request to determine their accessibility needs and what would be a suitable format or support and provide the requested information in a timely manner.

Employment Standards

Assisted Living Southwestern Ontario is committed to fair and accessible employment practices. We will take the following steps to notify the public and staff that, when requested, Assisted Living Southwestern Ontario will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.

 An offer to provide additional information regarding the position and the recruitment process will be included in job advertisements.
 Assisted Living Southwestern Ontario has put in place a return to work process which can be found in our *Health & Safety Manual - Policy* AHS-111(Early and Safe Return to Work Policy and Procedures) for employees that have been absent due to a disability.

We will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if Assisted Living Southwestern Ontario is using performance management, career development and redeployment processes.

 Assisted Living Southwestern Ontario will ensure that workers with disabilities who are redeployed or reassigned will be afforded appropriate accommodations in accordance with prescribed functional restrictions. See Appendix 1 and Appendix 2 Assisted Living Southwestern Ontario will provide all employees, including those with functional disabilities, the chance to participate in career development opportunities as they arise.

Design of Public Spaces

Assisted Living Southwestern Ontario will take the following steps to prevent and remove other accessibility barriers identified.

- With respect to any new construction or renovation, Assisted Living Southwestern Ontario will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces which it owns and/or controls.
- In the event of a service disruption, Assisted Living Southwestern Ontario will notify the public of the service disruption as soon as feasible and description of alternative option, if available.

Appendix 1

Documented Individual Accommodation Plan

The purpose of reasonable accommodation is to enable a person to perform at least the essential requirements of the job as defined in the job posting and/or job description. Assisted Living Southwestern Ontario is not required to create a job or significantly alter a job as to create a different job in order to accommodate an applicant or an employee.

Assisted Living Southwestern Ontario's Accommodation Plan addresses:

- How the employee can participate
- How the employee will be assessed
- How the employee can request accommodation
- How employee can request participation of union representative or bargaining agent in the process, if applicable
- How the employee's personal information will remain private and confidential
- How, and how often, the plan will be reviewed and updated
- How reasons for denied requests will be communicated
- How plan will be provided to employee

Individual Accommodation Plan

- 1. Accommodations assist in the inclusion of persons with disabilities into employment activities
- 2. Individuals are to be accommodated with respect and dignity and Assisted Living Southwestern Ontario will respond to accommodation plan requests in a timely manner
- 3. Accommodation is to be made only for those disability related needs disclosed by the employee or applicant that impact on employment
- 4. Accommodation needs are to be addressed in a way that is consistent with responsible financial management and

- operational requirements, and does not pose an undue hardship on Assisted Living Southwestern Ontario
- 5. Accommodation requirements are determined on person-byperson basis by ensuring that each employee with a disability is considered, assessed and accommodated individually, while maintaining a process that is consistent with the principles of confidentiality
- 6. The accommodation process allows the involvement and cooperation of the employee's union representative or bargaining agent, if appropriate or required. The employee must notify Assisted Living Southwestern Ontario that they wish to have additional parties present in the accommodation process reasonable parties (union representative or bargaining agent) will be accepted.
- 7. Assisted Living Southwestern Ontario is committed to achieving a culture and work environment that is supportive of employees with disabilities.
- 8. Assisted Living Southwestern Ontario will review the accommodation plan: if the employee is not satisfied with the accommodation plan, if the employee moves location, when the accommodation policies/plans are reviewed and when the general emergency response policies/plans are reviewed.

Appendix 2

Return-to-Work Process

Assisted Living Southwestern Ontario is committed to developing and maintaining a safe and healthy work environment, and understands that it is a good rehabilitation/reintegration practice to ensure a planned and safe return to work process is implemented following an injury or illness.

Assisted Living Southwestern Ontario will work with staff to facilitate the employee's return to work. Any modifications will be accommodated as soon as possible. Management will use the most appropriate measures for each individual case.

Purpose

The purpose of the Early Return to Work Program is to:

- Provide for the safe and sustainable reintegration into the workforce/job position
- Provide modified employment for employees who are temporarily disabled due to illness / accident or an injury in the workplace

Assisted Living Southwestern Ontario recognizes that in the case of some disabilities, a complete period of absence is required away from the workplace. In others cases, absence from the workplace is required only during the acute phase of the illness, injury, etc., before a reintegration process into the workplace can occur. The Return-to-Work Process may include the following steps:

 Assisted Living Southwestern Ontario will establish a senior level employee (management level or higher) that will oversee the return to work process. If a health specialist is required, Assisted Living Southwestern Ontario will seek the services of an individual (either internally or externally) who can grant guidance and consultation before, during and potentially after the return to work process.

- 2. During the course of an absence, the delegated senior staff member and/or health specialist will maintain regular communication with the employee and request updated medical document as required. Once the employee has regained the capacity fit for their return for work, consideration will be given to whether to modify the employee's duties.
- 3. When a health specialist or physician determines that the employee is fit to work, a customized and gradual return- towork plan is devised, in conjunction with the employee, senior management and/or health specialist, and the proposed plan is sent to the employee's treating physician for approval, when required.
- 4. Once approval has been received from the physician (if applicable), a return-to-work process is arranged with the established senior management employee, health specialist, the employee and a union representative or supervisor (if applicable). The approved return to work plan is reviewed amongst all parties and a formal Transitional Return to Work plan is created. The Transitional Return-to-Work Plan must have a defined end/termination date.
- 5. All parties review the proposed plan, discuss the details of the plan and each party confirms their agreement to the details defined in the plan by signing and dating the plan. Each party is provided with a signed and approved copy. It is the full responsibility of the employee to work within their restrictions and the responsibility of the delegated senior management employee to ensure no more is expected from the employee than what the plan documents.
- 6. Communication is maintained between all parties involved during the return-to-work process. A subsequent return- towork meeting can be arranged, if the plan is unable to be completed, maintained or is deemed ineffective by both the employer and employee.

7. The delegated senior management staff or health specialist will follow-up with the employee once a return to full duties has been achieved. Once this is complete, the employee and employer will both sign-off on the termination of the plan and the file will be closed.

In the event that suitable work can be identified, Assisted Living Southwestern Ontario will ensure, through the staff member's personal physician and the WSIB where applicable, that the employee is capable of performing modified or accommodated duties. Assisted Living Southwestern Ontario will inform the employee of the available work and request that he/she report to duty. If the employee refuses to accept the modified work assignment, their continuing employment with Assisted Living Southwestern Ontario may be jeopardized.

Potential Accommodations in the plan may include:

- Graduated return to work, regular duties
- Modified job expectations
- Alternative duties
- Modified work site
- · Job/responsibility sharing
- Difficult task assistance
- Job reassignment

Contact

We Value Your Questions and Feedback

Contact us with any questions or feedback you have on our services, accessibility, or organization as a whole.

• For inquiries regarding our services:

Phone 519-969-8188 ext. 317

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• For inquiries regarding employment:

Phone 519-969-8188 ext. 211

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By Mail: 1100 University Avenue West, Windsor, ON N9A 5S7