

# AODA Multi-Year Accessibility Plan

RESPONSIVE MANAGEMENT INC.

## MULTI-YEAR ACCESSIBILITY PLAN 2024 – 2028

The multi-year plan below outlines Banwell Gardens Long Term Care Home’s strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our commitment as outlined in Banwell Gardens Long Term Care Home’s Accessibility Policies.

<b>Accessibility for Ontarians with Disabilities Act (AODA), 2005                      Customer Service Accessibility Standards (CSAS), Ontario Regulation 429/07</b>		
<b>CSAS Section Requirement and                      Implementation Date</b>	<b>Action Required</b>	<b>Implementation Status</b>
<b>Development and implementation                      of customer service accessibility                      standards</b>  O. Reg. 429/07, s. 3. (1), (2).  January 1, 2012 standards	<ul style="list-style-type: none"> <li>Develop policies to meet needs of persons with disabilities including: Provision of goods and services, Personal assistive devices, Guide dogs/service animals, Support persons, Training and Feedback</li> </ul>	<ul style="list-style-type: none"> <li>Policy and procedure completed</li> <li>Policy posted on a new website for each home September 2013.</li> <li>Posted signage on entrance doors for Service Animals.</li> </ul>
<b>Training for staff</b>  O. Reg. 429/07, s. 6. (1), (2)  January 1, 2012   <b>Amendment effective July 1, 2016</b>	<ul style="list-style-type: none"> <li>Provide education to all staff, volunteers, and Service Providers on the following:                             <ul style="list-style-type: none"> <li>Purpose of AODA</li> <li>Policy and Procedures on AODA</li> <li>General Requirements – Emergency and Public safety information</li> </ul> </li> <li>Employment – Workplace emergency for employees with disabilities.</li> <li>Effective July 1, 2016 every employee, volunteer, and any other person who provides goods and services on behalf of the organization must be trained</li> </ul>	<ul style="list-style-type: none"> <li>DVDs (5) on Learning platform from AccessForward.</li> <li>Developed and added policy HR Manual K-10 – AODA Policy and HR Manual K-15 Customer Service Accessibility policy (included in Code of Conduct as Appendix G for all new hires, current staff, students, volunteers and service providers)</li> <li>Code of Conduct is reviewed annually with all staff.</li> <li>Emergency plans in place for employees requiring any workplace emergency assistance.</li> </ul> <p>Aligned with new requirements as of July 1, 2016</p> <ul style="list-style-type: none"> <li>Request 3rd party providers to sign off that they are AODA</li> </ul>

	on how to provide accessible customer service.	compliant. Maintain a copy of this information in the Homes Contract Binder. <ul style="list-style-type: none"> <li>● Service Providers are providing their AODA policy.</li> </ul>
<b>Feedback process for providers of goods or services</b> O. Reg. 191/11, s. 7  January 1, 2012  <b>Amendment effective July 1, 2016</b>	<ul style="list-style-type: none"> <li>● Implement a feedback process.</li> <li>● Solicit feedback and monitor barriers or improvements.</li> <li>● Review all feedback and action as required.</li> <li>● Under the new consolidated structure, the accessibility requirements of the Customer Service Standards apply to the provision of goods, services and facilities.</li> </ul>	<ul style="list-style-type: none"> <li>● Added an accessibility feedback option to the Client Service Response Form.</li> <li>● Respond and action as required to ensure accessibility requirements.</li> </ul>
<b>Accessibility for Ontarians with Disabilities Act (AODA)</b> <b>Integrated Accessibility Standards (IAS), Ontario Regulation 191/11</b> Please note that effective July 1, 2016 amendments to the AODA consolidated the Accessibility Standards for Customer Service and the Integrated Accessibility Standards (IAS) into a single Accessibility Standard		
<b>IASR Section Requirement and Implementation Date</b>	<b>Action Required</b>	<b>Implementation Status</b>
<b>GENERAL</b>		
<b>Accessibility Report</b> AODA,2005, c. 11, s.14 (1), (2), (3), (4)  By December 31 commencing 2012  <b>Amendment to Act</b> O. Reg. 413/12. S. 7. As of December 31, 2014	<ul style="list-style-type: none"> <li>● Complete and submit an Accessibility Report to the Ministry of Economic Development, Trade and Employment annually by Dec. 31, 2012 or as required</li> <li>● File the accessibility report required under subsection 14 (1) of the Act with a director according to the schedule</li> </ul>	<ul style="list-style-type: none"> <li>● Accessibility Report submitted December 7, 2012.</li> <li>● Three Windsor homes have been added to the RYKKA Business number.</li> <li>● Accessibility Reports filed for 2014, 2017, 2020, 2023 and every three years thereafter.</li> </ul>
<b>Establishment of Accessibility Policies</b> O. Reg. 191/11, s. 3.(1).  January 1, 2014	<ul style="list-style-type: none"> <li>● Develop, implement and maintain policies governing how the organization achieves or will achieve accessibility.</li> <li>● Include a statement of organizational commitment to meet the accessibility needs of</li> </ul>	<ul style="list-style-type: none"> <li>● Development of working group between RHM/RMI on the development of the following : <ul style="list-style-type: none"> <li>○ Commitment</li> <li>○ Statement</li> <li>○ Accessibility Policies</li> </ul> </li> </ul>

	<p>persons with disabilities in a timely manner.</p>	<ul style="list-style-type: none"> <li>● Commitment Statement (HR Manual K-05) developed Dec. 3, 2013</li> <li>● AODA policy (HR Manual K-10) developed Dec. 3, 2013 and with recent revisions of Dec 18, 2019</li> <li>● Customer Service/integrated Accessibility Standards (HR Manual K-15) developed Dec. 13, 2012.</li> <li>● Updated September 2016 to reflect the consolidation of the Customer Service Accessibility and Integrated Accessibility into the Accessibility Standard</li> <li>● AODA policies (HR Manual K-05, K-10, K-15) all updated June 6, 2018.</li> </ul>
<p><b>Accessibility Plans</b> O. Reg. 191/11, s. 4. (1)</p> <p>January 1, 2014</p>	<ul style="list-style-type: none"> <li>● Establish, implement and maintain a multi-year accessibility plan.</li> <li>● Post multi-year plan on website</li> <li>● Review and update plan every 5 years</li> <li>● Post annual status report of progress</li> <li>● Documents to be available in an accessible format upon request</li> </ul>	<ul style="list-style-type: none"> <li>● Multi-year plan approved at the Executive Group meeting January 2014.</li> <li>● Multi-year plan posted on the website for each home.</li> <li>● Multi-year plan updated December 2018 and 2024.</li> </ul>
<p><b>Procuring or Acquiring goods, services or facilities</b> O. Reg. 191/11, s. (5) &amp; (6)</p> <p>Section 5 – January 1, 2013 Section 6 - January 1, 2014</p>	<ul style="list-style-type: none"> <li>● Incorporate accessibility criteria and features when acquiring or purchasing goods, services or facilities.</li> </ul>	<ul style="list-style-type: none"> <li>● Collaborate with vendors to ensure accessibility obligations in procurement.</li> </ul>
<p><b>Training</b> O. Reg. 191/11, s. 7 (1), (2), (3), (4) &amp; (5).</p> <p>January 1, 2015</p>	<ul style="list-style-type: none"> <li>● Ensure that training is provided on the requirements of the accessibility standards regarding AODA and the Human Rights Code as it pertains to people with disabilities.</li> <li>● Training shall be appropriate to the duties of employees, volunteers and other persons.</li> </ul>	<ul style="list-style-type: none"> <li>● Collaborated with Surge Learning to incorporate training/education materials that will meet the training requirements of IASR for accessible formats.</li> <li>● Annual education reports to be reviewed to determine that</li> </ul>

	<ul style="list-style-type: none"> <li>● A record must be maintained of the training provided, including the training dates and the number of people who participated.</li> <li>● Training shall be provided in respect of any policy changes.</li> </ul>	<p>educational requirements have been met under IASR.</p>
<b>INFORMATION and COMMUNICATION STANDARDS</b>		
<p><b>Emergency Procedure, Plans or Public Safety Information</b> O. Reg. 191/11, s. 13 (1), (2)</p> <p style="text-align: center;">January 1, 2012</p>	<ul style="list-style-type: none"> <li>● Provide information on emergency procedures, plans, and public safety information in an accessible format or with appropriate communication supports, as soon as practicable, upon request</li> </ul>	<ul style="list-style-type: none"> <li>● Education and training is conducted annually on all emergency procedures and plans.</li> <li>● Emergency procedures and plans are also posted for public safety and in the Public Information binder.</li> <li>● Upon request managers will provide information on emergency procedures &amp; plans in an alternative format.</li> </ul>
<p><b>Workplace Emergency Response Information</b> O. Reg. 191/11, s. 13 (1), (2)</p> <p style="text-align: center;">January 1, 2012</p> <p style="text-align: center;">O. Reg. 191/11, s.27 (1), (2), (3), (4)</p> <p style="text-align: center;">December 18, 2019</p>	<ul style="list-style-type: none"> <li>● Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information as necessary and the employer is aware of the need for accommodation due to the employee's disability</li> <li>● With the employees consent, provide the person designated by the employer to provide assistance to the employee with the individualized workplace emergency response information.</li> <li>● Review the individualized workplace emergency information, a) when the employee moves to a different location in the organization; b) when the employee's overall accommodations needs or plans are reviewed; and c) when the</li> </ul>	<ul style="list-style-type: none"> <li>● Accommodation Policy (HR Manual A-12) was revised May 2016 with a recent revision of December 18, 2019.</li> <li>● Upon request or becoming aware of the need for accommodation by an employee who has a disability, we develop an accommodation plan that outlines what is required or needed, who is going to do it, and who will report that it is being done.</li> <li>● Emergency plans developed and practiced for AODA volunteers in place and employees as required.</li> <li>● All managers have been provided education and training to the adherence of O. Reg. 191/11, s. 13 (1), (2)</li> </ul>

	employer review its emergency response policies.	
<b>Accessible Websites and Web Content</b> O. Reg. 191/11, s. 14  January 1, 2014-WCAG 2.0 Level A January 1, 2012-WCAG 2.0 Level AA	<ul style="list-style-type: none"> <li>● Make new internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A</li> <li>● Make new internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, other than criteria noted in the legislation.</li> </ul>	<ul style="list-style-type: none"> <li>● Web designer has developed and implemented information to support compliance with the AODA standards for all home sites.</li> </ul>
<b>Feedback</b> O. Reg. 191/11, s. 14  January 1, 2015	<ul style="list-style-type: none"> <li>● Ensure that any process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication support upon request.</li> </ul>	<ul style="list-style-type: none"> <li>● Client Service Response forms are available and are in the public information binder to provide the opportunity for feedback</li> <li>● Leadership &amp; Governance Manual (LGM I-10) reviewed June 2018</li> </ul>
<b>Accessible Formats and Communication Supports</b> O. Reg. 191/11, s. 12  January 1, 2016	<ul style="list-style-type: none"> <li>● Provision of accessible formats and communication support for persons with disabilities must be provided or arranged upon request.</li> </ul>	<ul style="list-style-type: none"> <li>● Alternate formats and communication supports are available upon request whenever required.</li> </ul>
<b>EMPLOYMENT STANDARDS</b>		
<b>Employment Standards relating to Recruitment, Informing Employees, Accessible Formats, Individual Accommodation Plans, Return to Work Process, Performance Management, Career Development/ Advancement and Redeployment</b>  O. Reg. 191/11, s. (22), (23), (24), (25), (26), (27), (28), (29), (30), (31), (32)  January 1, 2016	<ul style="list-style-type: none"> <li>● As per Act and Regulation all Employment Standards relating to AODA will be reviewed and revisions implemented.</li> </ul> <p><b><u>Recruitment</u></b></p> <ul style="list-style-type: none"> <li>● Notify internal and external job applicants that accommodation for disabilities will be provided to support their participation in the recruitment process.</li> <li>● Notify selected applicants that accommodations are available on request.</li> </ul>	<ul style="list-style-type: none"> <li>● Policies and Procedures updated to meet the AODA commitment for 2016.</li> <li>● Job applications were updated to include accommodation for disabilities to support participation in the recruitment process.</li> <li>● Applicants are informed that accommodations are available on request.</li> <li>● New and existing employees are advised of the organization's policies for</li> </ul>

	<ul style="list-style-type: none"> <li>● Advise successful applicants of the organizations’ policies for accommodating employees with disabilities.</li> </ul> <p><b><u>Informing Employees</u></b></p> <ul style="list-style-type: none"> <li>● Inform new and existing employees of their policies for supporting employees with disabilities, including employment-related accommodation for disabilities.</li> </ul> <p><b><u>Accessible Formats</u></b></p> <ul style="list-style-type: none"> <li>● Consult with employees with disabilities in order to provide them with the accessible formats and communications support they require to do their jobs effectively and to be informed of information that is generally available to all employees in the workplace.</li> </ul> <p><b><u>Individual Accommodation Plans</u></b></p> <ul style="list-style-type: none"> <li>● Develop written individual accommodation plans for employees with disabilities.</li> </ul> <p><b><u>Return to Work Process</u></b></p> <ul style="list-style-type: none"> <li>● Have in place a documented process for supporting employees who return to work after being away for reasons related to their disability.</li> </ul> <p><b><u>Performance Management</u></b></p> <ul style="list-style-type: none"> <li>● Use performance management processes that consider the accessibility needs of employees with disabilities.</li> </ul>	<p>supporting employees with disabilities.</p> <ul style="list-style-type: none"> <li>● Letters of employment for both unionized and management employees were revised to include the AODA statement</li> </ul> <ul style="list-style-type: none"> <li>● There is an Accommodations Policy (HR Manual A-12 with recent revisions of Dec 18, 2019) that outlines procedures for employees requiring accommodation.</li> </ul> <ul style="list-style-type: none"> <li>● Employees who require accessible formats are provided with accessible formats of communication in discussion with the employee.</li> </ul> <ul style="list-style-type: none"> <li>● There is an Accommodations Policy (HR Manual A-12 with recent revisions of Dec 18, 2019) that outlines procedures for employees requiring accommodation.</li> </ul> <ul style="list-style-type: none"> <li>● There is an Accommodations Policy (HR Manual A-12 with recent revisions of Dec 18, 2019) that outlines procedures for employees requiring accommodation.</li> </ul> <ul style="list-style-type: none"> <li>● The UKG Performance Management Program and Individual Development Plan (IDP) considers the</li> </ul>
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	<p><b><u>Career Development</u></b></p> <ul style="list-style-type: none"> <li>● Consider the accessibility needs of employees who have disabilities</li> <li>● Provide employees with disabilities with the opportunities to advance within the organization.</li> </ul> <p><b><u>Redeployment</u></b></p> <ul style="list-style-type: none"> <li>● Consider the accessibility needs of employees with disabilities before moving them to other positions, so that employees can continue to have their accommodation needs met.</li> </ul>	<p>accessibility needs of employees with disabilities.</p> <ul style="list-style-type: none"> <li>● Job postings and external advertisements for positions were updated to include an AODA statement.</li> <li>● Orientation checklists for staff, volunteers, students, physicians and contracted services were revised to include an AODA statement.</li> <li>● The accessibility and accommodations needed of employees would be considered in accordance with established policies and procedures.</li> </ul>
<p><b>IAS Section Requirement Maintenance of Accessible Elements</b></p> <p>O. Reg. 191/11 s.80 (44)</p> <p>O. Reg. 413/12, s. 6</p>	<ul style="list-style-type: none"> <li>● Procedures for preventive and emergency maintenance of the accessible elements in public spaces.</li> <li>● Procedures for dealing with temporary disruptions when accessible elements are not in working order.</li> </ul>	<ul style="list-style-type: none"> <li>● Accessible elements in public spaces include automatic accessible door entrances.</li> <li>● Procedures are in place for preventative and emergency maintenance.</li> <li>● In the event of temporary disruptions, procedures are in place to deal with the situation, as required to maintain accessible elements of public spaces.</li> </ul>