

<b>ALAVIDA LIFESTYLES</b>		
<b>MANUAL</b> Operations	<b>SUBJECT</b> Accessibility Standards	Policy AD-31
<b>SECTION</b> Administration: Administrative Policies	<b>EFFECTIVE DATE:</b> January 2014	Page 1 of 9
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**STANDARD**

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 ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES’s strategy to prevent and remove barriers for persons with disabilities please refer to ALAVIDA LIFESTYLES’s Multi-Year Accessibility Plan (“the “Accessibility Plan”) which is available on the ALAVIDA LIFESTYLES website at [www.alavidalifestyles.com](http://www.alavidalifestyles.com).

**STATEMENT OF COMMITMENT**

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

**PROCEDURE**

**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 ALAVIDA LIFESTYLES; and
- iii. persons responsible for the development of ALAVIDA LIFESTYLES’s 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.

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## 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.

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- 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 Alavida Lifestyles to become compliant with two levels of the WCAG - Level A and Level AA.

## IMPLEMENTATION

Responsibility for the implementation of the Policy is shared between the corporate office and the residence operational departments. For more information please see ALAVIDA LIFESTYLES’ Accessibility Plan available on the Company’s website.

## GENERAL ACCESSIBILITY STANDARDS

### I. Accessibility Plan

ALAVIDA LIFESTYLES 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.

ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES’s website and will be made available in an Accessible Format upon request.

### II. Training

By December 31, 2014, ALAVIDA LIFESTYLES 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.

As part of the Orientation training delivered by the Alavida head office, new employees upon hire receive the required training as soon as practicable.

Volunteers will receive the required training from the residence’s Recreation managers as soon as practicable.

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ALAVIDA LIFESTYLES 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.

ALAVIDA LIFESTYLES will ensure that contractors providing goods, services and/or facilities on the Company's behalf have received the training required under the IAS from the residence's Office managers.

Revised training will be provided in case of changes to legislation, procedures and/or practices.

### **III. Self-Service Kiosk**

ALAVIDA LIFESTYLES doesn't utilize Self-Service Kiosks.

## **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 ALAVIDA LIFESTYLES does not control directly or indirectly through a contractual relationship.

Should ALAVIDA LIFESTYLES 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**

By January 1, 2015 ALAVIDA LIFESTYLES 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.

ALAVIDA LIFESTYLES will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

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

By January 1, 2016 ALAVIDA LIFESTYLES 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.

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ALAVIDA LIFESTYLES 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**

ALAVIDA LIFESTYLES 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**

By the Final Website Compliance Deadline (set for January 1, 2021) ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

## **EMPLOYMENT STANDARDS**

The Employment Standards only apply to employees of ALAVIDA LIFESTYLES. They do not apply to volunteers, other unpaid individuals or contractors.

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

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

ALAVIDA LIFESTYLES will further notify 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, ALAVIDA LIFESTYLES 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.

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**II. Notice to Successful Applicants**

By January 1, 2016 ALAVIDA LIFESTYLES 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**

By January 1, 2016 (the “Informing Employees of AODA Policies Compliance Deadline”) ALAVIDA LIFESTYLES 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.

ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES’s policies on supporting employees with disabilities as soon as practicable after commencing employment.

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

By January 1, 2016 ALAVIDA LIFESTYLES 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.

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

**V. Workplace Emergency Response Information**

If and when an employee has a disability and ALAVIDA LIFESTYLES is aware that, due to that disability, the employee requires an individualized workplace emergency response, information addressing such response is provided to the employee as soon as practicable after ALAVIDA LIFESTYLES becomes aware of such requirement.

In such a case, with the employee’s consent, ALAVIDA LIFESTYLES designates 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.

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ALAVIDA LIFESTYLES reviews 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 ALAVIDA LIFESTYLES reviews its general emergency response policies.

**VI. Documented Individual Accommodation Plans**

By January 1, 2016, ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES 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.

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**VII. Return to Work Process**

By January 1, 2016, ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES will take to facilitate the employee’s return to work and will use the documented individual accommodation plans described in section 0V.

**VIII. Performance Management**

By January 1, 2016, ALAVIDA LIFESTYLES 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**

By January 1, 2016, ALAVIDA LIFESTYLES 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**

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

**DESIGN OF PUBLIC SPACES STANDARDS**

ALAVIDA LIFESTYLES 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 ALAVIDA LIFESTYLES’s Accessibility Plan.

**OUTCOME**

Meet the accessibility needs of persons with disabilities in a timely manner.

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### **QUESTIONS ABOUT THIS POLICY**

For more information about the Policy or ALAVIDA LIFESTYLES's Accessibility Plan please contact:

Alavida Lifestyles  
 Suite 200 – 18 Antares Drive  
 Ottawa ON K2E 1A9  
 Phone: 613 226 7266  
 e-mail: info@alavidalifestyles.com

**REFERENCE:** *Accessibility for Ontarians with Disabilities Act, 2005 (the "Act"), Integrated Accessibility Standards (the "IAS") O Reg 191/11*