

# Accessibility Policy



## ACCESSIBILITY POLICY

**One Kenton Place Memory Care Limited Partnership o/a One Kenton Place** (“the Business”) 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.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under the ***Accessibility for Ontarians with Disabilities Act*** (“AODA”) and Ontario’s accessibility laws.

**One Kenton Place Memory Care Limited Partnership o/a One Kenton Place** is committed to meeting its current and ongoing obligations under the Ontario *Human Rights Code* respecting non-discrimination.

### APPLICATION AND SCOPE

This Policy is made pursuant to the requirements of the ***Accessibility for Ontarians with Disabilities Act, 2005*** (“AODA”) and the ***Integrated Accessibility Standards Regulation*** (“IAS Regulation”) of the AODA and addresses how the Business will achieve accessibility.

The Business understands its obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the ***Ontario Human Rights Code*** or obligations to people with disabilities under any other law.

**One Kenton Place Memory Care Limited Partnership o/a One Kenton Place** is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

This Policy will be reviewed and updated as necessary at least every five years and posted on our website.

For purpose of this Policy and Plan, “disability” is defined as follows:

- 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,
- a condition of mental impairment or a developmental disability,
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- a mental disorder, or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

## PRIVACY OF PERSONAL INFORMATION

The Business is committed to protecting the privacy of the employee's personal information throughout the accommodation process. Steps will be taken to ensure that any personal, medical, or other sensitive information provided by the employee is kept confidential and shared only with individuals who need to know in order to facilitate the accommodation. All information will be handled in compliance with applicable privacy laws and company policies.

At One Kenton Place, we OKP ensure that employee personal information is handled with the utmost care and security, fostering a trustworthy and compliant workplace environment.

1. **Data Inventory:** We Conduct a thorough inventory of all personal information stored in files and on computers. Identify where sensitive data is kept and who has access to it
2. **Minimize Data Collection:** OKP Only collects and retain personal information that is necessary for business operations
3. **Secure Storage:** We have Implemented strong security measures such as encryption, secure servers, and locked file cabinets to protect stored information
4. **Access Control:** Restrict access to personal information to authorized personnel only. We Use passwords, authentication, and access logs to monitor and control access
5. **Employee Training:** The employees are trained on data privacy policies and best practices to ensure they understand how to handle sensitive information responsibly
6. **Regular Audits:** We Conduct regular audits to ensure compliance with data protection policies and identify any vulnerabilities
7. **Proper Disposal:** Ensure that personal information is properly disposed of when no longer needed, such as shredding paper documents and securely deleting digital file

## TRAINING

The Business is committed to and provides training to all its employees and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, the Business will train:

- all persons who participate in developing its policies; and
- all other persons who provide goods, services or facilities on behalf of the Business.

The training includes:

- (a) purpose of the **Accessibility for Ontarians with Disabilities Act**, 2005 and the requirements for the provision of accessible Customer Service Standards
- (b) Training on **the Ontario Human Rights Code** as it related to persons with disabilities
- (c) on the requirements of the **Integrated Accessibility Standards Regulation** ("IAS Regulation") as appropriate to duties of the employees, volunteers, and other persons, including:
  - i. Information and Communication Standards;
  - ii. Employment Standards;

- iii. Design of Public Spaces Standard; and
- iv. Transportation Standards.

Training is provided as soon as practicable after an employee or volunteer joins the Business and on an on-going basis whenever this Policy is updated or modified.

The Company has flexibility to determine the training needs and the way in which employees, volunteers, or other persons are trained.

Staff may be trained at:

- a) An Orientation Session
- b) A mandatory Online module
- c) In a Conference/Staff Group Setting
- d) Or other formats that work best for the Company.

The Company maintains records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Whenever this Policy is subject to updates or amendments, Staff members will be re-trained by means of on-site training, through online modules, or other formats that work best for the Company.

Employee can request participation of a representative or from bargaining unit from workplace in the development of accommodation plan .

Representative from SEIU Health can contribute:

1. **Advocacy:** The SEIU Health representative can advocate for the employee's rights and ensure their needs are clearly communicated and considered.
2. **Expertise:** They bring knowledge of labor laws and collective agreements, which can help in identifying appropriate accommodations.
3. **Support:** The representative provides emotional and practical support to the employee throughout the process.
4. **Negotiation:** They can negotiate with the employer to ensure that the accommodations are fair and meet the employee's needs.
5. **Documentation:** The representative can assist in gathering and organizing necessary documentation to support the accommodation request.
6. **Follow-Up:** They ensure that the agreed-upon accommodations are implemented effectively and follow up on any issues or adjustments that may be needed.

At OKP employee can request for support from bargaining unit by

1. **Written Request:** Submit a written request to the HR department or direct supervisor, clearly stating the need for a representative and the reason for their involvement.
2. **Oral Request:** Make an oral request during a meeting with HR or the supervisor, followed by a written confirmation to ensure there's a record of the request.
3. **Email:** Send an email to HR or the supervisor detailing the need for a representative and how they can assist in the accommodation process.

4. **Union Representative:** If part of a union, request the union representative's involvement through the union's established procedures.
5. **Advocate or Support Person:** Inform HR or the supervisor of the choice of an advocate or support person, such as a family member, friend, or professional advocate.

## INFORMATION AND COMMUNICATION STANDARDS

The Business communicates with people with disabilities in ways that take into account their disability. This may include the following:

1. **Speech-to-Text Software:** Converts spoken words into written text, aiding those with speech impairments.
  - o **Microsoft Dictate:** An AI-enabled add-on for Office 365 and Windows 10.
2. **Text-to-Speech Systems:** Reads written text aloud, assisting those with visual impairments or reading difficulties.
  - o **Read Aloud:** A browser extension that reads text aloud with adjustable voices and speeds.
3. **Simple Picture Boards and Communication Books:**

The Business will work with persons with disabilities to determine what method of communication works best for them.

### Accessible Formats and Communication Supports

The Business has a process for receiving and responding to feedback and this process is accessible to persons with disabilities upon request.

Upon request, and in accordance with the compliance schedule set out in the IAS Regulation, the Business will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is not greater than the cost charged to other persons, if any. The Business will consult with the person making the request to determine the suitability of an accessible format or communication support and notify the public about the availability of these formats and supports.

The Business shall provide the requestor with

- a) An explanation as to why the information or communications are unconvertible; and
- b) A summary of the unconvertible information or communications.

The Business will notify the public about the availability of accessible formats and communication supports by

1. **[Large Print:** OKP Uses larger font sizes for printed materials to assist those with low vision.
2. **Audio Formats:** we can Offer audio recordings of the update for those who prefer listening.

3. **Easy Read:** Use simplified text with images to help those with cognitive disabilities understand the information.
4. **Accessible PDFs:** We can Create PDFs that are compatible with screen readers and other assistive technologies.

Our Information technology websites meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA requirements in accordance with Ontario's Accessibility laws.

### Emergency Information

Where the Business prepares emergency procedures, plans or public safety information and makes such information available to the public, it shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

### **EMPLOYMENT STANDARDS**

The Business is committed to ensuring that its employment practices comply with the *AODA*, *IAS Regulation* and the *Ontario Human Rights Code*.

The Business notifies employees, job applicants, and the public that accommodations can be made during the recruitment and hiring processes. The Business commits that it will continue to notify employees, job applicants, and the public about its accommodation process. Upon request, the Business will consult with the individual about their accommodation needs to provide adjustments and arrangements to their job responsibilities or the workplace suited to the supports that they need.

### Recruitment

The Business welcomes and encourages applications from candidates with disabilities. Accommodations are available upon request for candidates participating in the selection process, as publicized in our job postings. The Business notifies selected candidates involved in the selection process that accommodations are available upon request. We consult with all applicants who request disability-related accommodations to arrange suitable accommodations in response to their individual accessibility needs, including accessible formats and/or communication supports.

Successful applicants are informed about the Business's policies on disability-related accommodations when offers of employment are extended. Whenever a selected applicant requests an accommodation, the Business consults with the applicant and provides or arranges for suitable accommodation in a manner that considers the applicant's accessibility needs due to a disability.

Our employees and staff are notified about available supports for individuals with disabilities as soon as practicable upon the commencement of their employment or volunteer relationship. The Business provides updated information and training to staff whenever there is a change to our existing accessibility or accommodations policies.

### Accessible Formats & Communication Supports for Staff

The Business consults with its Staff at every stage of the employment cycle for coordinating the provision of suitable accommodation in a manner that considers the accessibility needs due to disability. Whenever an individual requests disability-related accommodations, the Business will also consult with the person in determining the suitability of an accessible format or communication supports, specifically for:

- The Information that is needed to perform the employee's job; and
- The Information that is generally available to employees in the workplace.

### Performance Management, Career Development and Advancement, Redeployment

The Business has a written process to develop an individual accommodation plans for employees. Accommodation Plans. The company will consider each employee's specific needs, considering their unique situation. The employee will be actively involved in the development of their individual accommodation plan to ensure it addresses their specific requirements.

The Business is committed to support every employee, including individuals with disabilities, in their professional advancement within this organization.

The Business has a written process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work.

Our performance management, career development, and redeployment processes consider the accessibility needs of all employees.

### External Evaluation

If necessary, the Business may request an evaluation by an external medical or other expert to assist in determining whether accommodation can be provided for an employee, and if so, how it can be effectively implemented. This evaluation will be conducted at the Business's expense, and the expert's recommendations will help guide the development of a suitable accommodation plan tailored to the employee's specific needs.

### Workplace Emergency Response Information

The Business, where needed, will provide individualized workplace emergency response information to assist an employee with disability during an emergency. With the employee's consent, the Business will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency. The Business provides this information as soon as practicable after becoming aware of the need for accommodation.

Upon consultation with the individual, the Company will provide an individualized workplace emergency response plan information according to their disability-related needs. If needed, this may include alternate formats that accommodate their disability-related needs.

The Business will review the individualized workplace emergency response 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 employer reviews its general emergency response policies.

### Denial of Accommodation

If an individual accommodation plan is denied, the employee will be provided with a clear explanation of the reasons for the denial. This explanation will be communicated in writing, outlining the specific factors or limitations that led to the decision. The company will also discuss potential alternatives or next steps with the employee, ensuring transparency and open communication throughout the process.

### CUSTOMER SERVICE POLICY

The Business is committed to excellence in serving all customers, including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws and our obligations under the *Human Rights Code*.

### Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

The Business will ensure that our Staff are trained and familiar with various assistive devices we have on site, or that we provide, that may be used by customers with disabilities while accessing our goods, services, or facilities.

### Communication

The Business communicates with people with disabilities in ways that take into account their disability.

The Business communicates with individuals with disabilities in the following ways:

1. **Large Print:** Printed materials with larger text to assist those with low vision.
2. **Audio Formats:** Recorded versions of text, such as audiobooks or spoken word recordings.
3. **Electronic Text:** Digital documents that can be read using screen readers or other assistive technologies.



We will work with the person with a disability to determine what method of communication works for them.

### Service Animals

The Business welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises which is open to the public and/or third parties.

When we cannot easily identify whether an animal is a service animal, our staff may ask the individual to provide documentation from a regulated health professional that confirms the individual needs the service animal for reasons relating to their disability.

The Business acknowledges that a service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will ensure the customer with disabilities can access our goods, services or facilities by explaining why the animal is excluded and discussing with the customer another way of providing goods, services or facilities.

Service Animals are prohibited from the following areas:

### Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

If a fee or fare is normally charged to a customer for accessing your goods, services or facilities, choose one of the following options:

Fee/Fare will not be changed for support persons.

The Business will notify customers about this policy regarding Support Persons by posting a notice in the following location(s):

1. **front bulletin board**
2. **Website:** Include the notice on the homepage and the accessibility policy page.
3. **Social Media:** Share the policy on platforms like Instagram and Facebook.

In certain cases, the Business might require a person with a disability to be accompanied by a support person for the health or safety reasons of the person with a disability or others on the premises.

Before making such a decision, the Business will:

- Consult with the person with disability to understand their needs;
- Consider health or safety reasons based on available evidence;
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

If the Business determines that a support person is required, we will waive the admission fee or fare (where applicable) for the support person.

### **NOTICE OF TEMPORARY DISRUPTION**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the Business will notify customers promptly. Clearly posted notices will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Services and facilities include: Long-term care services and residence

The notice will be made publicly available as follows: posted internally and available upon request

The notice will be made publicly available as follows: on the Business' website, social media and/or by posted notice on the premises.

### **FEEDBACK PROCESS**

The Business welcomes feedback on how we provide accessible customer service. Customers feedback is crucial to help the Business identify barriers and respond to concerns.

The Business will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Feedback on the way the Business provides goods, services or facilities to people with disabilities can provide feedback in the following way(s):

In-person at: 1 Kenton Dr, North York, ON M2R 2H6

By telephone by calling: (647) 932-7913

By email to: [info@onekentonplace.ca](mailto:info@onekentonplace.ca)

By mail to: 1 Kenton Dr, North York, ON M2R 2H6

All feedback received, including complaints, will be reviewed within a reasonable time period and the BusinessOne Kenton Place will take all appropriate steps to address any issues raised.

All complaints will be processed in accordance with the Business's complaints process. Customers can expect to hear back in [5 business days].

### Accessibility Standards for our Facilities

The Business is committed to designing our premises and related disruption free from barriers and accessible to all persons we serve, including individuals with disabilities. Where appropriate, the Business will provide necessary modifications and adjustments to our premises to accommodate persons with disabilities. The Business will comply with the Design of Public Spaces Standards with respect to public spaces that are newly constructed or redeveloped in accordance with the requirements of the IAS Regulation.

### References

- Accessible Customer Service Policy
- *Accessibility for Ontarians with Disabilities Act, 2005*
- Regulation 191/11 made under the *Accessibility for Ontarians with Disabilities Act, 2005* (Integrated Accessibility Standards)

### Notice of Temporary Disruption

The Business will notify about unexpected or planned disruption within our facilities or services generally used by people with disabilities. All notices will provide necessary information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, where available.

## **NOTICE OF AVAILABILITY OF DOCUMENTS**

The Business notifies the public that documents related to accessible customer service are available upon request by posting a notice in the following location(s)/way(s):

1. **Website:** OKP has a dedicated accessibility page.
2. **Social Media:** we have a dedicated Instagram page to Share updates and information as well.
3. **Email Newsletters:** we Inform subscribers about accessible documentation options and a monthly newsletter as well.
4. **Customer Service:** OKP has Trained representatives to mention accessible documentation during interactions.

The Business will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and at no additional cost.

## **SELF-SERVICE KIOSKS**

The Business shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. "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.

## **CHANGES TO EXISTING POLICIES**

Any policies from the Business that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

## **REVIEW OF THE POLICY**

This Policy will be reviewed and may be amended from time to time based on the needs and experiences of the Business.

## ACKNOWLEDGEMENT & AGREEMENT

I acknowledge that I have read, understand, and agree to abide by the Accessibility Policy.

**SIGNATURE:** \_\_\_\_\_  
Employee

**NAME:** \_\_\_\_\_  
Print

**DATE:** \_\_\_\_\_