

<b>DEVELOPER:</b> HR Business Partner	<b>MANUAL:</b> Human Resources	<b>SECTION:</b> Employment Standards of Conduct	<b>INDEX-ID:</b> HR-B-130
<b>APPROVED BY:</b> Executive Director	<b>SUBJECT NAME:</b> Accessibility for Persons with Disabilities & Integrated Accessibility Standard Policy		<b>PAGE:</b> 1 of 7
<b>REVIEWED/REVISED DATE:</b> May 2023	<b>NEXT REVIEW DATE:</b> May 2025	<b>SUPERSEDES:</b> N/A	<b>DATE:</b> October 2012

**ACCESSIBILITY FOR PERSONS WITH DISABILITIES & INTEGRATED  
ACCESSIBILITY STANDARD POLICY**

**POLICY**

Markhaven, Inc. is committed to providing accessible customer service to all persons and employees with disabilities. This policy is designed to explain the consistently high customer service standards we will uphold for all persons and employees regardless of disability.

Markhaven, Inc. shall provide all persons and employees the opportunity to provide feedback on the services provided to them. Feedback Forms (HR-B-130-01) along with options for alternate methods of providing feedback are available.

Markhaven, Inc. will make every reasonable effort to notify customers and employees promptly in the event of a planned or unexpected disruption to services or facilities used by disabled persons.

In accordance with the Accessibility for Ontarians with Disabilities Act 2005, wherever appropriate, support will be provided in the recruitment process and accommodation for disabilities will be provided on request.

**PURPOSE**

The purpose of this Statement of Policy and Procedure is to ensure all persons and employees with disabilities are treated with dignity, independence, integration, and equal opportunity by Markhaven, Inc. employees. This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11. It outlines the accessibility plan, policies, and actions that Markhaven, Inc. will put in place to improve opportunities for people with disabilities.

**SCOPE**

This Statement of Policy and Procedure applies to every person who deals with members of the public, our residents, or their agents on behalf of Markhaven, Inc. This includes but is not limited

to all staff, volunteers, service providers and other third parties. All parties are expected to provide accessible service as outlined in the Integrated Accessibility Standards, Ontario Regulation 191/11.

## **RESPONSIBILITY**

### HR Business Partner/Senior Management

- Responsible for ensuring Markhaven, Inc. is in compliance with *Integrated Accessibility Standards, Ontario Regulation 191/11*. and this policy and for reporting compliance information to the Ministry.
- Responsible for ensuring training is provided to employees.
- Review the policy on an annual basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.
- Collect and follow up on all feedback from customers and employees.
- Notify customers and employees when there is a disruption in services used by disabled persons.
- Responsible to review the requirements of the IASR.
- Revise this policy to address how Markhaven achieves or will achieve accessibility through meeting the IASR's requirements.
- Develop the Multi Year Accessibility Plan in accordance with the IASR.

### Directors/Managers:

- Responsible for ensuring their department and the staff comply with this policy and the *Integrated Accessibility Standards, Ontario Regulation 191/11* and for reporting compliance information to Senior Management. They are also responsible for ensuring that the needs of persons with disabilities are considered when procuring goods or services.
- Enforce the company's high customer service standards.
- Set an example by their own behaviour.

### Staff/Volunteers/Contractors:

- Who provide service to Markhaven residents are responsible for ensuring they are aware of the policy, complete training and follow the policy, procedures, and practices as outline herein and in the Integrated Accessibility Standards, Ontario Regulation 191/11.

## **COMMUNICATIONS**

- Employee Orientation
- Annual Training and Development Program
- Markhaven, Inc. Human Resources Manual

## **TRAINING**

Every person who participates in developing Markhaven’s policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. This includes all employees who may conduct business with disabled persons; they will be trained on the aspects of this policy. New employees who may conduct business with disabled persons will receive this training as part of the new hire orientation.

### **Training Overview:**

1. Review of the purposes of the AODA and requirements of the customer service standard;
2. Instruction on how to interact and communicate with people with various types of disabilities;
3. Instruction on how to interact with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal or a support person;
4. Instruction on how to use equipment or devices available at your premises or that you provide otherwise, that may help people with disabilities access your services, such as TTY telephones, elevators, lifts, accessible interactive kiosks or other technology; and
5. Instruction on what to do if a person with a disability is having difficulty accessing your services.

## **REFERENCES**

### **Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”)**

The AODA develops, implements, and enforces accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures, and premises are accessible to persons with disabilities. The AODA intends to achieve an accessible Ontario by Jan 1, 2025. To do so, mandatory, and enforceable standards have been implemented.

The **Standards** include:

#### **1. Customer Service Standard – Ontario Regulation 429/07**

The Customer Service Standard (Ontario Regulation 429/07) was the first standard under the AODA to become law. It ensures that people with disabilities can receive goods and services in a manner that considers one’s disability.

Requirements include the development of a policy, practices, procedures as well as the provision of training for staff and volunteers.

Markhaven, Inc. submitted compliance reports to the province indicating we had addressed the requirements of the Regulation and were meeting the compliance obligation. We will continue to ensure compliance with the Customer Service Standard.

We developed feedback processes to respond to inquiries and suggestions received by phone, email, mail, in person. This has been communicated to internal and external stakeholders.

## 2. Integrated Accessibility Standard Regulation (IASR) – Ontario Regulation 191/11

The IASR brings together the following standard areas in one Regulation: Information and Communication, Employment, Built Environment and Transportation. The Transportation Standard does not apply to us. General requirements common to all standard areas include policy development and training (on the requirements of the IASR and the *Ontario Human Rights Code*) Also, there is a requirement to ensure that accessibility features are considered in the kiosk procurement process.

The requirements have staggered compliance dates up to the year 2021.

### MARKHAVEN, INC. INTEGRATED ACCESSIBILITY STANDARD REQUIREMENTS AND MULTI-YEAR ACCESSIBILITY PLAN

#### Self-Service Kiosks

Markhaven will have regard for the need of persons with disabilities when procuring or acquiring self-service kiosks.

<b>Multi-Year Accessibility Plan</b>			
<b>Action</b>	<b>Compliance Date</b>	<b>Responsibility</b>	<b>Status</b>
<b>Part I – General</b>			
This section of the Regulation requires us to:			
<ul style="list-style-type: none"> <li>• develop &amp; maintain an accessibility policy and a multi-year accessibility plan</li> <li>• self-service kiosks – consider accessibility features that best meet the needs of customers</li> <li>• ensure staff and volunteers are trained on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code</li> </ul>			
<b>Accessibility Policies</b>			
* Develop and implement Integrated Accessibility Standards Policy.	August, 2014	HR Business Partner	Complete
* Make the Policy publicly available and provide in an accessible format, upon request.			
* Review & update as required			
<b>Develop a multi-year accessibility plan</b>			
* A Multi Year Accessibility Plan was developed.	August, 2014	HR Business Partner	Complete
* Post multi-year accessibility plan on website and provide in an accessible format, upon request.			
* Review and update the plan at least once every five years.	Jan 1, 2024		Plan to be reviewed and updated by Jan 1, 2029
<b>Self-service kiosks</b>			
* Process was developed as guidance for employees to have regard for the need of persons with disabilities when procuring or acquiring self-service kiosks.	August 2014	HR Business Partner	Complete
<b>Training</b>			Complete

* Ensure that training is developed on the IASR and the Human Rights Code as it pertains to persons with disabilities and is provided by Jan 1, 2015 to employees, volunteers, persons who participate in developing policies and others who provide goods, services or facilities on behalf of Markhaven, Inc. Update training as required.	Jan 1, 2015 & Ongoing	HR Business Partner	
* Keep a record of the dates of training and the individuals who received the training.			

## Part II – Information and Communications Standards

This section of the Regulation includes requirements related to:

- accessible feedback processes
- accessible formats and communication supports
- publicly available emergency procedures, plans, public safety information
- accessible websites and web content

<b>Feedback processes</b>	August 2014	HR Business Partner	Complete
*Ensure that processes for receiving and responding to feedback are accessible and meet the requirements of the IASR.			
<b>Accessible formats and communication supports</b>	August 2014 & Ongoing	HR Business Partner	Complete
*Upon request, to the extent practicable, provide for provision of accessible formats and communication supports for persons with disabilities.			
* Consult with person making the request to determine suitability of accessible format or communication support.			
* Put a statement on the website that we shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities at a cost no more than regular cost charged to other persons.			
<b>Emergency procedures, plans or public safety information</b>	August 2014 & Ongoing	HR Business Partner	Complete
* Emergency procedures, plans or public safety information, that is publicly available, shall be provided in an accessible format or with appropriate communication supports, upon request as soon as practicable.			
<b>Accessible websites and web content</b>	September 2012 & ongoing	Web Development Services Executive Director	Complete
* Websites and web content published after 2012 to conform to WCAG 2.0 Level A initially and increasing to WCAG 2.0 Level AA by Jan 1, 2021 to the extent practicable other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions).			
* Note – All WCAG2.0 requirements only apply to websites, web content and web based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible.			

## Part III – Employment Standards

This section of the Regulation includes requirements related to:

- recruitment, assessment and selection
- accessible formats and communication supports for employees
- workplace emergency response
- individual accommodation plans and return to work processes
- performance management, career development and redeployment

<b>Recruitment, Assessment, Selection</b>	Jan 1, 2016 & Ongoing	HR Business Partner	Complete
* Review and update existing recruitment, policies, procedures and processes.			

* Specify that accommodation is available for applicants with disabilities on the website and on job postings.			
* Inform applicants about the availability of accommodations: when called for an interview, during the selection process, at the time of the job offer and as soon as practicable after the new employee begins – specifically at orientation.			
* If selected applicant requests accommodation, consult with the applicant and arrange for provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability.			
<b>Informing employees of supports</b>			
* Inform current employees and new hires as soon as practicable after they begin employment of policies supporting employees with disabilities.	Jan 1, 2016	HR Business Partner	Complete
* Keep employees up to date on changes to policies/procedures relating to accommodation.			
<b>Accessible formats and communication supports for employees</b>			
* When requested by an employee with a disability, employers shall consult with the employee and provide or arrange for the provision of suitable accessible formats and communication supports needed to perform the employee's job.	Jan 1, 2016	HR Business Partner	Complete
<b>Workplace emergency response information</b>			
* Individualized workplace emergency response information procedures have been developed for employees with disabilities.	2012	HR Business Partner	Complete
<b>Documented individual accommodation plans / Return to work Process</b>			
* Create a written process for the development of documented individual accommodation plans and return to work plans for employees with disabilities.	Jan 1, 2016	HR Business Partner	Complete
* Include in the process and plans all of the required elements in accordance with the provisions of the IASR.			
<b>Performance management, career development, advancement and redeployment</b>			
* Review and update existing policies, practices to ensure compliance with IASR			
* Take the accessibility needs of employees with disabilities and, as applicable, individual accommodation plans, into account as part of performance management processes, when assessing performance, providing career development & advancement opportunities and considering redeployment.	Jan 1, 2016	HR Business Partner	Complete
<b>Part IV.1 – Design of Public Spaces Standards</b>			
This section of the Regulation includes requirements related to:			
<ul style="list-style-type: none"> <li>• recreational trails &amp; beach access routes (NA)</li> <li>• outdoor public use eating areas &amp; outdoor play spaces</li> <li>• exterior paths of travel</li> <li>• parking</li> <li>• obtaining service</li> <li>• maintenance</li> </ul>			
<b>Obtaining service – Make service counters, queuing guide and waiting areas accessible.</b>			
* Where practicable, all indoor or outdoor newly constructed areas and all newly constructed or redeveloped common areas will conform to all of the required elements in accordance with the provisions of the IASR.	Jan 1, 2017	Executive Director	
<b>Maintain the accessible parts of our public spaces.</b>	Jan 1, 2017		

* Identify preventative and emergency maintenance procedures & alternatives & procedures for handling disruptions and alternatives in accordance with the provisions of the IASR.		HR Business Partner	
<b>Make parking accessible</b>			
* Where practicable, new and redeveloped parking areas meet certain technical requirements in accordance with the provisions of the IASR.	Jan 1, 2017	Executive Director	
<b>Make exterior paths of travel accessible.</b>			
* Where practicable, new and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose (includes stairs, ramps, curb ramps, depressed curbs, pedestrian signals, rest areas) and not to provide a recreational experience meet certain technical requirements in accordance with the provisions of the IASR.	Jan 1, 2017	Executive Director	
<b>Make outdoor public eating areas accessible.</b>			
* If newly constructing or redeveloping outdoor public eating areas, where practicable, meet certain technical requirements in accordance with the provisions of the IASR.	Jan 1, 2017	Executive Director	
<b>Make outdoor play spaces accessible (i.e. swings, splash pads, natural features such as sand and logs).</b>			
* If building new or redeveloping outdoor play spaces, e.g. gardens, follow consultation process and technical requirements, where practicable, in accordance with the provisions of the IASR.	Jan 1, 2017	Executive Director	

**Definition of Disability**

*Disability*, as defined by the AODA and the *Ontario Human Rights Code*, is:

- 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*.