



Greenwood

RETIREMENT COMMUNITIES

Customer Service & Integrated Accessibility Standards

PURPOSE:

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 Greenwood Retirement Communities currently achieves accessibility by meeting the requirements of the IAS and how it will continue to work towards improving accessibility for persons with disabilities.

STATEMENT OF COMMITMENT:

Greenwood Retirement Communities is committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with disabilities in a timely manner. Greenwood Retirement Communities will provide goods and services in a way that is accessible to people with disabilities consistent with the core principles of dignity, equality of opportunity, Integration and Independence. We are also committed to giving customers and employees with disabilities the same opportunity to access and benefit from our facilities, goods and services as our other customers.

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 Greenwood Retirement Communities and
- III. Persons responsible for the development of Greenwood Retirement Communities policies.

This Policy does not replace or affect existing legal obligations under the Human Rights Code R.S.O. 1190, c. H.19, as it may be amended from time to time, or any other applicable laws respecting the accommodation of persons with disabilities.

DEFINITIONS:

- 1. **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.
- 2. **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.
- 3. **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 our opt out insurance plan
- 4. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- 5. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- 6. **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.

7. **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.
8. **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.
9. **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 Greenwood Retirement Communities 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 all departments.

GENERAL ACCESSIBILITY STANDARDS:

I. Accessibility Plan:

Greenwood Retirement Communities 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.

Greenwood Retirement Communities 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.

II. Training:

Greenwood Retirement Communities will provide training to all existing employees, volunteers and all person who participate in the development of AODA policies.

Training will include the following:

- a. A review of the purpose of the Accessibility for Ontarians with Disabilities Act including related regulations and requirements of the Customer Service Standard and Integrated Accessibility Standards.
- b. Information on applicable Human Rights Code legislation as it pertains to persons with disabilities.
- c. Instruction on how to interact and communicate with people with various types of disabilities.
- d. How to interact with people with disabilities who use an assistive device or require the assistance of a guide dog, other service animal or a support person.
- e. Instruction on the location of our assistive devices and how to use equipment or devices available at our homes or that we provide.

- f. Instruction on what to do if a person with a disability is having difficulty in accessing our goods and services (asking the person how he/she can be accommodated and what alternative methods of service provision would be more accessible).
- g. Greenwood Retirement Communities policies and procedures relating to the Customer Service and Integrated Accessibility Standards.
- h. How to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

Each staff member will receive this training as soon as practicable upon joining our team. Staff will also be trained on an ongoing basis when changes are made to Greenwood Retirement policies, practices and procedures.

Greenwood Retirement Communities will keep a record of the training, including dates on which the training is provided and the signatures of employees to whom it is provided.

Greenwood Retirement Communities will ensure that contractors providing goods, services and/or facilities on the Company's behalf have received the training required under the IAS.

III Assistive devices:

Greenwood Retirement Communities welcome our customers and employees with disabilities to our facilities and allow them to use their own personal assistive devices within our facility i.e. walkers, white canes, note-taking devices and oxygen tanks etc. If there is a physical, technological or other type of barrier that prevents the use of an Assistive Device on our premises we will first endeavor to remove that barrier. If we are not able to remove the barrier, we will ask the person how he/she can be accommodated and what alternative methods of service would be more accessible to him/her. We will make every effort to provide an alternative means of assistance to the person with a disability.

IV Service Animal:

Greenwood Retirement Communities are committed to welcoming customers with disabilities who are accompanied by their guide dog or service animal in those areas of the premises we own or operate that are open to the public, unless the animal is excluded by another law. If a service animal is excluded by law, we will use other measures to provide services to the person with a disability. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with customers with disabilities who are accompanied by a service animal.

V Support Person:

Greenwood Retirement Communities are committed to welcoming customers with disabilities who are accompanied by a support person. At no time will a customer with a disability who is

accompanied by a support person be prevented from having access to his or her support person while on our premises. Greenwood Retirement Communities may require a person with a disability to be accompanied by a Support Person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that

- a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
- b) there is no other reasonable way to protect the health of safety of the person with a disability and the health or safety of others on the premises.

Where a customer requires the assistance of a support person to participate in any facility programming or to attend any facility event, notice will be provided ahead of time on what admission fees, if any, would be charged for a support person.

VI Self-Service Kiosk

Greenwood Retirement Communities will have regard to the accessibility for persons with disabilities when designing, procuring or acquiring Self-Service Kiosks.

INFORMATION & COMMUNICATION STANDARDS:

Greenwood Retirement Communities will ensure that communication with a person with a disability takes into consideration that particular individual's needs and circumstances. We will not make assumptions on his/her ability and where possible we will ask the person directly how they wish us to communicate with them. Communication will also be considered at the inception of a new policy or procedure.

The Information & Communication Standards do not apply to:

- a. Products and product labels;
- b. Unconvertible information or communications; and
- c. Information that Greenwood Retirement Communities does not control directly or indirectly through a contractual relationship.

Should Greenwood Retirement Communities 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. Telephone services:

Greenwood Retirement Communities are committed to providing fully accessible telephone service to our customers. We will offer to communicate with customers by email if telephone communication is not suitable to their communication needs or is not available.

II. Feedback Process:

Greenwood Retirement Communities 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.

Greenwood Retirement Communities will notify the public that Accessible Formats and Communication Supports are available in respect of its feedback procedures.

III. Accessible Formats and Communication Supports:

Greenwood Retirement Communities 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.

Greenwood Retirement Communities will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support.

IV. Billing:

Greenwood Retirement Communities are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, email. We will answer any questions customers may have about the invoice in person, by telephone or email.

V. Emergency Plans, Procedures or Public Safety Information:

Greenwood Retirement Communities will provide 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.

VI. Accessible Websites and Web Content:

Greenwood Retirement Communities will ensure that where practicable, any website or content on such site(s) published after January 1, 2012 conforms with WCAG 2.0 Level A. to the extent required by the IAS.

The commitment to provide accessible websites and web content only applies to websites and web content that Greenwood Retirement Communities controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

VII. Notice of Temporary Disruption:

Greenwood Retirement Communities will provide notice to employees, the residents, their families and friends and the public when there is a planned or unexpected disruption of facilities or services used by customers with disabilities to access our goods or services. This notice will include the following information:

- a. That a facility or service is unavailable
- b. The anticipated duration of the disruption
- c. The reason for the disruption
- d. Alternative facilities or services that may be available.

The notice will be placed at all public entrances and service counters on our premises. When possible, disruptions that are known in advance will be posted online.

EMPLOYMENT STANDARDS:

The Employment Standards only apply to employees of Greenwood Retirement Communities. They do not apply to volunteers, other unpaid individuals or contractors.

I. Recruitment /Selection/Assessment:

Greenwood Retirement Communities will notify the public and employees of the availability of accommodation for job applicants during the recruitment process.

Greenwood Retirement Communities will further notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request in relation to the assessment or selection process, if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, Greenwood Retirement Communities 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.

II. Notice to Successful Applicants:

Greenwood Retirement Communities 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:

Greenwood Retirement Communities 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.

Greenwood Retirement Communities 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 new employees will be notified of Greenwood Retirement Communities policies on supporting employees with disabilities as soon as practicable after commencing employment.

IV. Accessible Formats and Communication Supports for Employees:

Greenwood Retirement Communities 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.

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

V. Workplace Emergency Response Information:

If an employee has a disability and Greenwood Retirement Communities is aware that, due to that disability, the employee requires an individualized workplace emergency response, information addressing such response will be provided to the employee as soon as practicable after Greenwood Retirement Communities becomes aware of such requirement.

In such a case, with the employee's consent, Greenwood Retirement Communities will designate 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.

Greenwood Retirement Communities will review 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 Greenwood Retirement Communities reviews its general emergency response policies.

VI. Documented Individual Accommodation Plans:

Greenwood Retirement Communities has 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 Greenwood Retirement Communities 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 Greenwood Retirement Communities 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 V (Workplace Emergency Response Information) above and s.27 of the IAS.

VII. Return to Work Process:

Greenwood Retirement Communities will prepare 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 Greenwood Retirement Communities will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section 8VI.

VIII. Performance Management:

Greenwood Retirement Communities 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:

Greenwood Retirement Communities 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:

Greenwood Retirement Communities 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:

Greenwood Retirement Communities 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.

- a) **Exterior Paths Of Travel** – Greenwood Retirement Communities will ensure that any exterior paths of travel such as outdoor sidewalks, and walkways, ramps, stairs and curb ramps that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Places Standards.
- b) **Off Street Parking** – Greenwood Retirement Communities will ensure that when Greenwood constructs new or redevelops off- street parking facilities that it intends to maintain, the off-street parking facilities meet the requirements of the Design of Public Places Standards. (Off Street parking is a space where you can park your vehicle temporarily that is not on a public road or street.)
- c) **Obtaining Services** – Greenwood Retirement Communities will meet the requirements of the Design of Public Places Standard in respect of the following: all newly constructed service counters and fixed queuing guides and all newly constructed or redeveloped waiting areas.
- d) **Maintenance** – Greenwood Retirement Communities have developed a policy that includes preventative and emergency maintenance of the accessible elements in public

spaces. Greenwood Retirement Communities have developed a policy that deals with temporary disruptions when accessible elements required are not in working order.

Questions about this policy:

This policy exists to achieve service excellence for our customers with disabilities. For more information about his Policy or Greenwood Retirement Communities Accessibility Plan please contact:

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