

# Belmont HOUSE

<b>SUBJECT:</b>	AODA – Multi-Year Accessibility Plan & Policies		
<b>VOLUME:</b>	Volume 1 – Administration Human Resources	<b>ORIGINAL DATE:</b>	December 31, 2013
<b>REVIEWED BY:</b>	Human Resources Joint Occupational Health & Safety Committee	<b>REVISED DATE:</b>	April 23, 2024
<b>APPROVED BY:</b>	Chief Executive Officer	<b>PAGE :</b>	Page 1 of
<b>SIGNATURE:</b>			

## PURPOSE

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 Belmont House will put in place to improve opportunities for people with disabilities.

## PREAMBLE

This policy applies to every person who deals with members of the public, our residents or their agents on behalf of Belmont House 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*.

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- General Requirements
- Accessible Formats and Communication Supports
- Accessible Websites and Web Content
- Education and Training Resources
- Emergency Procedures, Plans or Public Safety Information
- Employment Standards Overview
- Exceptions
- Feedback
- Recruitment, Assessment and Selection
- Documented Individual Accommodation Plans
- Plans and Processes
- Return to Work and Redeployment

## POLICY

1. The Joint Occupational Health & Safety Committee (JHSC) led by the Human Resources Department is responsible for the Accessibility for Ontarians with

Disabilities Act (AODA) program. The Chief Executive Officer (CEO) will approve and sign off on the plan including this policy.

2. Belmont House will continue to monitor the Province of Ontario's legislative reviews of accessibility laws and requirements. Belmont House will continue to comply with the AODA and its regulations, including any amendments to existing and release of new applicable standards. As legislated, the JHSC will review and update this plan at least once every five (5) years.

AODA documentation including the Multi-Year Plan will be posted on the Company website at [www.belmonthouse.com](http://www.belmonthouse.com) and can be made available in an accessible format or with communication supports upon request.

AODA information including the Multi-Year Plan is available internally for the Belmont House community on the U drive, Human Resources Department, Health & Safety Board, Front Desk and Main and West Desk Kiosks.

Accessible formats include large print documents, digital text files and audio. Other formats may be available upon request.

3. The current Multi Year Plan covers the period 2023 to 2028.
4. It is the responsibility of the Joint Occupational Health & Safety Committee to:
  - a) Identify and understand structures, laws, rules, policies, programs, practices and services of, or applicable to, the organization regarding accessibility and barriers to access that people with disabilities may encounter.
  - b) Ensure the organization meets its obligations under the AODA to develop a multi-year accessibility plan and other requirements as required under the law.
  - c) Develop and implement an accessibility plan that includes, among other things: The identification and prioritization of barriers that need to be addressed as per established standards over the next year and subsequent years through consultation with people with disabilities, Belmont community and employees. Goals/objectives will be documented in the Multi-Year Plan.
  - d) Evaluate the progress made toward achieving objectives as per AODA target dates and completion dates. Status reports will be minuted at JHSC and Senior Management meetings.
  - e) Update the multi-year accessibility plan and make it available to the public as per Policy #2.

- f) Act as the organization’s ambassador in the elimination of barriers and promotion of accessibility.
  - g) Communicate all documents in the program to staff, volunteers and any other applicable parties and ensure they are trained on accessibility issues and the policies and plans as required by law.
  - h) Prepare and submit the necessary reports and documentation to the CEO and management and to the government as legally required.
  - i) Monitor progress to ensure the plan is being implemented based on objectives/goals set and make adjustments if necessary.
  - j) Submit Accessibility (compliance) reports as required to the Government of Ontario, which regulates compliance for all Ontario organizations.
5. AODA will be a standing item on the agenda for the monthly Occupational Health & Safety Committee Meetings. Human Resources will update the Committee on the actionable items on the Multi-Year Plan including progress made and if any changes/updates have to be made to the policy itself.
6. Belmont House is committed to treating all people in a way that allows them to maintain their dignity and independence. Belmont believes in integration and equal opportunity. Belmont is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.
7. Employment services and Information and Communication materials and services shall follow the principles of Dignity, Independence, Integration (except when alternate measures are necessary to meet the needs of people with disabilities) and Equal Opportunity.

### **GENERAL REQUIREMENTS**

General requirements that apply across both the *Information and Communications* and *Employment Standards* are outlined as follows below.

The Plan outlines the long-term strategies of the organization to achieve legislated accessibility requirements and improve accessibility within programs, services and the facility.

Below is a listing of actions required by the AODA previously taken that are already in place as a result of earlier plans in addition to continuing action (upcoming goals).

The actions listed in this Plan (previous, current and in the future) are aimed at ensuring that Belmont House remains compliant with all legal requirements and that the plan is maintained including continuing assessing all factors that may result in a barrier.

A.1 Establishment of Accessibility Policies and Plans

- Belmont House will develop, implement and maintain policies guiding how it will achieve accessibility through these requirements. Belmont House is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This should be achieved through documentation in Belmont House's policies and making these documents publicly available, in an accessible format upon request.
- Belmont House will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation.
- Belmont House will post its accessibility plans on their website, if any, and provide the plan in an accessible format upon request.
- Belmont House will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement Belmont House's accessibility plan and post this status on its website. If requested, the report shall be created in an accessible format.

A.2 Procuring or Acquiring Goods and Services, or Facilities

- Effective January 1, 2014, Belmont House will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

A.3 Training Requirements

- By January 1, 2015, Belmont House will provide training for its employees and volunteers regarding the IASR and the Ontario *Human Rights Code*. Training will be provided for individuals who are responsible for developing the organization's policies, and all other persons who provide, goods, services or facilities on behalf of Belmont House.

Belmont House will keep a record of the number of individuals who were trained and the dates that the training was provided.

Training records will be kept by the Human Resources Department and retained as per legal requirements.

A.4 Self-Serve Kiosks

- Effective January 1, 2014 Belmont House will ensure accessibility features are incorporated when procuring or acquiring self-service kiosks. This applies to the procuring of new and replacement of any current kiosks after January 1, 2014. Belmont House will always be aware of the accessibility features of self-service kiosks for persons with disabilities.

Where kiosks cannot be modified, Belmont House will indicate alternative ways to access the service,

**B. Accessible Formats and Communication Supports**

B.1 Belmont House will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual. Belmont House will take into account the person's accessibility needs when customizing individual requests.

B.2 By January 1, 2016, if an employee with a disability requests it, Belmont House will provide or arrange for the provision of accessible formats and communication supports for the following:

1. Information needed in order to perform their job; and
2. Information that is generally available to all employees in the workplace.

Belmont House should consult with the employee making the request to determine the best way to provide the accessible format or communication support.

**C. Accessible Websites and Web Content**

C.1 By January 1, 2021, Belmont House will make its web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. Web content includes any information which resides on an internet or intranet web site.

**D. Education and Training Resources**

D.1 Commencing January 1, 2015, Belmont House will ensure that educational or training institutions (as defined in the regulation) provide training materials and learning courses in accessible formats. These accessible formats must take into account the needs of students with disabilities. Student records and program information such as course requirements, descriptions and availability must be made available in accessible formats, upon request.

**E. Emergency Procedures, Plans or Public Safety Information**

E.1 Belmont House will provide public emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports as soon as practicable, upon request.

**F. Employment Standards Overview**

F.1 The Employment Standard requires employers to provide for accessibility across all stages of the employment life cycle – recruitment, providing accessible information, plans for emergencies, individual accommodation, return to work, performance manager

and career development redeployment. It is a framework for integrating accessibility into regular workplace processes.

## **G. Exceptions**

- G.1 The *Information and Communications Standard* does not apply to products and product labels; unconvertible information or communications; or information that the organization does not control directly or indirectly through a contractual relationship. If the organization determines that information or communications are unconvertible, the organization should provide the person requesting information or communication with the following:
- a. An explanation as to why the information or communications are unconvertible;
  - b. A summary of the unconvertible information or communications;
  - c. Information is regarding as *unconvertible* if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.

## **H. Feedback Process**

- H.1 By January 1, 2015 Belmont House will ensure that the processes already in place 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.

## **I. Recruitment, Assessment and Selection**

- I.1 By January 1, 2016 Belmont House will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants must be informed that these accommodations are available, upon request, for the interview process and other candidate selection methods. Belmont House must notify the successful applicant of their policies and supports for accommodating people with disabilities.

## **J. Documented Individual Accommodation Plans**

Belmont House will accommodate any employee with a disability. Human Resources with co-operation from the employee will determine suitable accommodations. The plan will be documented in writing and reviewed periodically to ensure the employee's needs are met.

Visitors with a disability that could prevent them from remaining safe in the event of an emergency may notify Reception upon their arrival at the Home in order to ensure the Home responds properly if an unexpected emergency event happens.

Frequent visitors (Family, Friends of a resident) may request a formal accommodation plan to be developed in the event of an emergency. Human Resources would be

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responsible for the development. Example – Belmont has evacu-chairs for each stairwell for those that cannot walk up and down stairs in an emergency situation which requires an evacuation from a care floor or the entire building.

Those requiring accommodations in an emergency situation will be asked to sign a waiver that allows Belmont to share potential confidential information with emergency staff in charge so they can act and assist in the event of an emergency in the absence of Human Resources in the building.

**K. Plans and Processes**

Any change in processes will take into consideration the effect of all parties in the workplace that may have a disability. Individual Accommodation plans will be modified accordingly. Any changes within the Belmont House building will take into consideration the AODA rules regarding building requirements. Those plans will be discussed with contractors, Board of Directors, Management to ensure barriers are not created within the Home.

**L. Return to Work and Redeployment**

Belmont House will accommodate an employee who has a temporary or permanent Disability. The return to work plan will be documented in writing with input from the employee, supervisor, applicable doctor, and union. Return to work plans will be revisited periodically or when appropriate.

**PROCEDURES**

1. The following parties are responsible for the following:
  - **Senior Managers** are responsible for ensuring Belmont House compliance with *Integrated Accessibility Standards, Ontario Regulation 191/11*.and this policy and for reporting compliance information to the Ministry.
  - **Directors, Managers and/or Supervisors** are 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 taken into account when procuring goods or services.
  - **Frontline Staff, Volunteers, Contractors** who provide service to Belmont House residents are responsible for ensuring they are aware of the policy, attend training and follow the policy, procedures and practices as outline herein and in the *Integrated Accessibility Standards, Ontario Regulation 191/11*.

<b>MULTI-YEAR ACCESSIBILITY PLAN</b> <b>2023 to 2028</b> (previous and current goals listed below)
<b>GENERAL</b>
This section of the Regulation requires Belmont House to: <ul style="list-style-type: none"> <li>• Develop and maintain an accessibility policy and a multi-year accessibility plan</li> </ul>

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- Self-service kiosks considering accessibility features that best meet the needs of customers
- Ensure staff and volunteers are trained on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code

ITEM	DEADLINE	ACTION TAKEN	PLANNED ACTION BY
<b>Accessibility Policies</b>			
Develop and implement Integrated Accessibility Standard Policy	<b>January 1, 2012</b>	Belmont House has established program to comply with AODA standards. In keeping with this regulation, the organization is committed to providing respectful services that focus on the unique needs of the individual.  Reported compliance to Service Ontario's One-Source for Business website.	<b>Completed – Director, HR</b>
File accessibility (compliance) reports with the Government of Ontario	<b>December 31, 2023</b>	Completed by deadline.  Additional supporting documentation and modification of program/policies completed in Winter and Spring of 2024	<b>Completed – Director, HR</b>
Make the policy publicly available and provide in an accessible format upon request	<b>January 1, 2012</b>	<a href="http://www.belmonthouse.com">www.belmonthouse.com</a> Noted on website that accessible formats are available upon request.  Belmont House will ensure and maintain communication methods with persons with disabilities with the objective that they can access/obtain information needed.  <b>Reviewed: May 2021, December 2023, April 2024</b>	<b>Completed – Director, HR</b>
Review and update as required	<b>Ongoing</b>	<b>Reviewed: December 2016, May 2021, December 2023, April 2024</b>	<b>Completed – Director, HR &amp; Joint Occupational H&amp;S Committee</b>
<b>Develop a multi-year accessibility Plan</b>			
A Multi-Year Accessibility Plan was developed	<b>January 1, 2012</b>	<b>Reviewed: December 2016, May 2021, December 2023, April 2024</b>	<b>Completed – Director, HR</b>
Post Multi-Year Accessibility Plan on website and provide in an accessible format upon request	<b>January 1, 2012</b> <b>Ongoing</b>	<a href="http://www.belmonthouse.com">www.belmonthouse.com</a> <b>Reviewed: December 2016, May 2021, December 2023, April 2024</b>	<b>Completed – Director, HR</b>
Review and update the plan at least once every five years	<b>Ongoing</b>  <b>December 31, 2028</b>	<b>Reviewed: December 2016, May 2021, December 2023, April 2024</b>  <b>Multi Year Plan updated at the request of AODA Compliance in April 2024 which covers 2023 to 2028.</b>	<b>Completed – Director, HR &amp; Joint Occupational H&amp;S Committee</b>
<b>Self-Service Kiosks</b>			
Process was developed as guidance for employees to have regard for the needs of persons with disabilities when procuring or acquiring self service kiosks	<b>January 1, 2014</b>	Belmont House will ensure accessibility features are incorporated when procuring or acquiring self-service kiosks. This applies to the procuring of new and replacement of any current kiosks after January 1, 2014. Belmont House will	<b>Completed – Director, HR</b>



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		always be aware of these accessibility features of service kiosks for persons with disabilities.  <b>Ongoing. New kiosks introduced in 2019 (Parking) and 2021 (COVID-19 Screening Devices) require the assistance of 3<sup>rd</sup> parties (Front Desk) for the visually impaired</b>	
<b>Training</b>			
Ensure the 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 to facilities on behalf of Belmont House. The training is updated as required	<b>January 1, 2015</b>	Belmont House ensures applicable parties are trained and familiar with AODA.  Belmont House will ensure that all employees, volunteers and all other persons who provide goods and services and persons participating in the development of approval of policies are provided with appropriate training on the requirements of the IASR and the Ontario Human Rights Code as it pertains to person with disabilities and are provided with such training as soon as possible  This including how to help those with disabilities including with various assistive devices available that may be used by customers with disabilities who are accessing Belmont House goods or services.  <b>Reviewed: May 2021, December 2023, April 2024</b>	<b>Completed – Director, HR</b>
Update and implement training material	<b>December 31, 2024</b>		<b>Completed – Director, HR &amp; Joint Occupational H&amp;S Committee</b>
Ensure all employees, volunteers and all applicable parties continue to complete mandatory AODA and accessibility training appropriate to the person's role as per deadlines set by the Home.	<b>December 31<sup>st</sup> in 2024, 2025, 2026, 2027, 2028</b>	Annual review to be conducted at the end of each year.  Training material will be reviewed by the JHSC in cooperation with each Department Head to ensure the material is appropriate/tailored to each role in the Company.	<b>Ongoing, Joint Occupational Health &amp; Safety Committee</b>
Keep record of the dates of training and the individuals who received the training.	<b>January 1, 2012</b>	Belmont House ensures completion training is tracked and recorded.  <b>Reviewed: May 2021, December 2023</b>	<b>Completed and Ongoing Education Committee (Surge)</b>

**INFORMATION AND COMMUNICATION 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 contents

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Feedback Process			
Ensure that processes for receiving and responding to feedback are accessible and meet the requirements of the IASR	January 1, 2012	Feedback processes through email, mail, phone, website in place as of January 1, 2012.  <b>Reviewed: May 2021, December 2023</b>	Completed – Director, HR
Accessible formats and communication supports			
Upon requests to the extent practicable provide for provision of accessible formats and communication support for persons with disabilities	January 1, 2012	Alternate methods are available upon request. Belmont House will accommodate where possible.  <b>Reviewed: May 2021, December 2023. This is to be assessed per request.</b>	Completed – Director, HR
Consult with person making the request to determine suitability of accessible format or communication support.	January 1, 2012	Feedback process in place.  <b>Ongoing.</b>	Completed – Director, HR
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 person.	January 1, 2012	<a href="http://www.belmonthouse.com">www.belmonthouse.com</a>  <b>Reviewed: May 2021, December 2023, April 2024. Website updated Spring 2021 with new website introduced.</b>	Completed – Director, HR
Emergency procedures , plans or public safety information			
Emergency procedures, plans or public safety information that is publicly available shall be provided in an accessible format or with appropriate communication supports, upon requests as soon as practicable	January 1, 2012	<u><i>Belmont House has been in compliance since January 1, 2012.</i></u>  -Emergency procedures, plans and public safety information that are prepared by Belmont House and made available to the public will be made available in an accessible format or with appropriate communication supports as soon as possible when requested  -Templates and tools have been created to help comply in this area -For employees with a disability and where there is a need for accommodation, Belmont House will create individualized workplace emergency response plans and provide the information to the employee -Consent is obtained to ensure designated people within the organization have the relevant information to provide assistance to the employee -Review periodically the plan to ensure it is up to date, remains relevant (if disability is temporary) and that it continues to meet the needs of the party -Belmont House will offer to create individualized workplace emergency response plans to frequent visitors, students and volunteers if a request is made  <b>Reviewed: May 2021, December 2023, April 2024. This is to be assessed per request.</b>	Completed – Joint Occupational Health & Safety Committee
Accessible websites and web content			

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<p>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 2.2.4 (captions) and 1.2.5 (Pre-recorded audio descriptions).</p>	<p><b>January 1, 2014 or 2021 if no changes made</b></p>	<p>*Required compliance date January 1, 2014 – WCAG 2.0 Level A for New internet websites or websites that are extensively changed.</p> <p><b>Updated December 2020. Changes Reviewed May 2021, December 2023.</b></p> <p><b>No changes have been made to the Belmont House website between 2012 to 2020. Senior Management have been updated of this standard and that the Home must be compliant by December 31, 2020 deadline.</b></p> <p><b>Website provider changed in late 2020 and new website launched in early 2021. New website is compliant with AODA standards.</b></p>	<p><b>Completed – Foundations Coordinator, Senior Management</b></p>
<p>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.</p>	<p><b>January 1, 2014 or 2021 if no changes made</b></p>	<p>If Belmont makes changes, the website will need to be compliant immediately. Otherwise January 1, 2021.*</p> <p><b>Updated December 2020. Changes Reviewed May 2021, December 2023.</b></p>	<p><b>Completed – Foundations Coordinator, Senior Management</b></p>

### 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 plan and return to work processes
  - Performance management, career development and redeployment

ITEM	DEADLINE	ACTION TAKEN	PLANNED ACTION
<b>Obtaining service – Make service counters, queuing guide and waiting areas accessible</b>			
<p>Review and update existing recruitment, policies, procedures and processes</p>	<p><b>January 1, 2016.</b></p>	<p>Belmont House has reviewed and modified existing recruitment policies, procedures, processes and templates</p> <p><b>Reviewed: May 2021, December 2023.</b></p>	<p><b>Completed – Director, HR</b></p>
<p>Specify that accommodations is available for applicants with disabilities on the website and on job postings</p>	<p><b>January 1, 2016</b></p>	<p><u>Recruitment:</u> Belmont House will comply with the provisions of the AODA in respect of this requirement with the objective of making the recruitment process accessible to persons with disabilities.</p> <p>Website and job postings (internal and external) reflects AODA requirements</p> <p><b>Reviewed: May 2021, December 2023.</b></p>	<p><b>Completed – Director, HR</b></p>
<p>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</p>	<p><b>January 1, 2016</b></p>	<p>Accommodation notice must be included as part of the recruitment process (scheduling of interview, assessment process, location of interview)</p> <p><b>Reviewed: May 2021, December 2023.</b></p>	<p><b>Completed – Director, HR</b></p>

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employee begins, specifically at orientation			
If selected applicant requests accommodations, consult with the applicant and arrange for provision of suitable accommodation in a manner that takes into account the applicants accessibility needs due to a disability.	<b>January 1, 2016</b>	If applicant selected requests an accommodation, Belmont House will consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicants accessibility needs due to disability  If an offer is made to an applicant, Belmont's accessibility policies will be discussed/provided and an individual accommodation plan may be created where necessary  <b>Reviewed: May 2021, December 2023.</b>	<b>Completed – Director, HR</b>
<b>Informing employees of support</b>			
Inform current employees and new hires as soon as practicable after they begin employment of policies supporting employees with disabilities.	<b>January 1, 2016</b>	Accommodation reference will be added to employment letters  <u>Employee Support:</u> Inform its employees of its policies used to support its 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. Belmont will provide information required to new employees as soon as they begin their employment. Belmont will provide employees with updated information when it changes and will provide this information in an appropriate manner. Where an employee with a disability requests it, Belmont will consult with the employee to provide or arrange for the provision of accessible formats and communication support (information required to perform the job, information generally available in the workplace).  Create waiver form for staff to sign off in order to share confidential information for emergency situations.  <b>Reviewed: May 2021, December 2023, April 2024</b>	<b>Completed – Director, HR</b>
Keep employees up to date on changes to policies/procedures relating to accommodations.	<b>January 1, 2016</b>  <b>May 31, 2024</b>	Communication channel used for staff – internal newsletters and paystub notices.  <b>Reviewed: May 2021, December 2023.</b>  Communicate and distribute updated policies.	<b>Completed – Director, HR</b>  <b>Director, HR</b>
<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.	<b>January 1, 2016</b>	Individual Accommodation Plans will include the following: -employee requesting accommodation is participated in the creation of the plan -employee is assessed on an individual basis -appropriate documentation will be provided by the employee to assist with creating an accurate plan.	<b>Completed – Director, HR</b>

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	April 23, 2024	<p>-Belmont may request a 3<sup>rd</sup> party medical expert at Belmont's expense in determining if accommodation can be achieved</p> <p>-employee may include a representative of their choosing in this process (example – union rep)</p> <p>-steps taken to maintain the employee's privacy</p> <p>-frequency plan will be revisited/reviewed/updated</p> <p>-If plan is denied, an explanation will be provided</p> <p><b>Reviewed: May 2021, December 2023, April 2024.</b></p> <p>-clarified plan and policies on accessible formats and communication support.</p>	Director, HR & Joint Occupational Health & Safety Committee
<b>Workplace emergency response information</b>			
Individualized workplace emergency response information procedures have been developed for employees with disabilities	<p>January 1, 2016</p> <p>April 23, 2024</p> <p>December 31, 2024</p>	<p>Belmont House considers the needs of all parties within the Home (residents, tenants, employees, volunteers, students, visitors etc.) when dealing with emergency response.</p> <p>Employees with disabilities that require assistance during an emergency situation is noted by HR.</p> <p><b>Reviewed: May 2021, December 2023, April 2024.</b></p> <p>Updated emergency accommodation procedures for individuals including training and employment policies.</p> <p>Conduct audit, review and update accommodations in place for applicable individuals.</p>	<p>Completed – Director, HR</p> <p>Director, HR &amp; Joint Occupational Health &amp; Safety Committee</p> <p>Director, HR</p>
Conduct Mock Emergency Drill	December 31, 2025	To ensure compliance with the program requirements.	Joint Occupational Health & Safety Committee
<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	January 1, 2016	<p>Early and Safe Return to Work Program (ESRTW) in place. Belmont where needed will use external advisers to assist with the accommodation process to ensure the appropriate measures are in place to make the ESRTW Program successful.</p> <p>Documented Individual Accommodation</p>	Completed – Joint Occupational Health & Safety Committee

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	<b>April 23, 2024</b>	<p><u>Plans/Return to Work Process:</u> Belmont House will ensure that policies are up to date and reflect processes where an employee with a disability is appropriately and fairly accommodated and to facilitate an employee’s return to work program after absenteeism due to a disability.</p> <p><b>Reviewed: May 2021, December 2023.</b></p> <p>Updated policies/support material to ensure compliance with all legal requirements</p>	<b>Completed – Director, HR &amp; Joint Occupational Health &amp; Safety Committee</b>
Include in the process and plans all of the required elements in accordance with the provisions of the IASR	<b>January 1, 2016</b>  <b>April 23, 2024</b>	<p>-Belmont will take steps to ensure the appropriate employee support is provided as described under “Items” to ensure the employee’s needs are met as per their disability and accommodation needs.</p> <p>-Belmont House will review and revise policies to ensure they include a process for the development of documented individual accommodation plans for employees with a disability if such plan is required</p> <p><b>Reviewed: May 2021, December 2023, April 2024.</b></p> <p>Updated policies/support material to ensure compliance with all legal requirements.</p>	<b>Completed – Director, HR</b>  <b>Completed – Director, HR &amp; Joint Occupational Health &amp; Safety Committee</b>
<b>Performance Management, career development, advancement and redeployment</b>			
Review and update existing policies, practices to ensure compliance with IASR	<b>January 1, 2016</b>	<p>Belmont House is committed to complying with the provisions set out in this requirement with the objective of accommodating applicants and employees in any and all manners appropriate and where legally required as per AODA, Ontario Human Rights Code and where otherwise applicable.</p> <p><b>Reviewed: May 2021, December 2023, April 2024.</b></p>	<b>Completed – Director, HR &amp; Joint Occupational Health &amp; Safety Committee</b>
Take the accessibility needs of employees with disabilities and as applicable individual accommodations plans into account as part of performance management processes when assessing performance providing career development and advancement opportunities and considering redeployment	<b>January 1, 2016</b>	<p>Belmont House take the accessibility needs of employees with disabilities and as applicable their individualized accommodation plans into account when assessing performance, managing career development and advancement and where redeployment is required.</p> <p><u>Performance Management, Career Development and Redeployment:</u> Belmont House will take into account the accessibility needs of employees</p>	<b>Completed – Director, HR</b>

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		with disabilities as well as individual accommodation plans: 1. When using its performance management process in respect of employees with disabilities 2. When providing career development and advancement to its employees with disabilities 3. When redeploying employees with disabilities  <b>Reviewed: May 2021, December 2023, April 2024.</b>	
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**DESIGN OF PUBLIC SPACES STANDARDS**

**\*This section of the Regulations includes requirements related to:**

- Recreational trails and beach access routes *(Not applicable to Belmont House)*
- Outdoor public use eating areas and outdoor play spaces *(Not applicable to Belmont House)*
- Exterior paths of travel
- Parking
- Obtaining services
- Maintenance

ITEM	DEADLINE	ACTION TAKEN	PLANNED ACTION
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**Obtaining service – Make service counters, queuing guide and waiting areas accessible**

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	<b>January 1, 2017</b>	There has not been any activity in this regard (indoor or outdoor) at Belmont House. The Director of Support Services who is responsible for the building is aware of this requirement for new initiatives pursued in the future.  <b>Reviewed: May 2021, December 2023.</b>	<b>Director, Support Services</b>
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**Maintain the accessible parts of our public space**

Identify preventative and emergency procedures and alternatives and procedures for handling disruptions and alternatives in accordance with the provisions of the IASR.	<b>January 1, 2017</b>	Belmont House is a private facility that is only open to guests of residents and tenants. Emergency procedures dealing with different emergency scenarios have been established, practiced and analyzed for continuous improvement.  <b>Reviewed: May 2021, December 2023.</b>	<b>Director, Support Services</b>
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**Make parking accessible**

Where practicable, new and redeveloped parking areas meet certain technical requirements in accordance with the provisions of the IASR.	<b>January 1, 2017</b>	Belmont House redesigned/redeveloped parking spaces in the West Lot in 2018. 3 <sup>rd</sup> party developers used for the project who followed AODA guidelines. Disability parking spaces accessed/created based on current requirements.  <b>Reviewed: 2018, May 2021, December 2023.</b>	<b>Director, Support Services</b>
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**Make exterior paths of travel accessible**

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 purposes (includes stairs, ramps, curb ramps,	<b>January 1, 2017</b>	No sidewalks/path redevelopment at Belmont House. Pedestrian travel methods (sidewalks) have been discussed with the City of Toronto in recent years as the Rosedale neighborhood around Belmont House is being analyzed for possible changes.	<b>Director, Support Services</b>
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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.		Reviewed: May 2021, December 2023.	
<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 ISAR	January 1, 2017	Only outdoor area for resident use only (Stillman Garden which is enclosed on the Belmont House grounds). No changes have been made and/or planned for the future.  Reviewed: May 2021, December 2023.	Director, Support Services
<b>Make outdoor play spaces accessible</b>			
If building new or redeveloping outdoor play space follow consultation process and technical requirements where practicable in accordance with the provisions of the IASR.	January 1, 2017	Not applicable.  Reviewed: May 2021, December 2023.	Director, Support Services

## DEFINITIONS

- **Accessible Formats** – include but not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.
- **Communication Supports** – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- **Conversion Ready** – an electronic or digital format that facilitates conversion into an acceptable format.
- **Educator** – Is an employee who is involved in a program or course design, delivery and instruction.
- **Extranet Website** – a controlled extension of the intranet, or internal network of an organization to outside users over the Internet.
- **Information** – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.
- **Internet Website** – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.
- **Intranet Website** – an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.
- **Kiosk** – an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products.



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- **Mobility Aid** – a device used to facilitate the transport, in a seated posture, of a person with a disability.
- **Mobility Assistive Device** – a cane, walker or similar aid.
- **Performance Management** – activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.
- **Redeployment** – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.
- **Support Person** – in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs, or with access to goods, services or facilities.
- **Web Content Accessibility Guidelines** – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

**REFERENCES:**

- Accessibility for Ontarians with Disabilities Act, 2005.
- AODA Belmont House Program
- Diversity in the Workplace Program (Belmont House)
- Integrated Accessibility Standards, Ontario Regulation 191/11
- Ontario Employment Standards Act, 2000 (ESA)
- Ontario Human Rights Code

**CROSS-REFERENCE:**

AODA - Accessible Customer Service Policy
AODA - Integrated Accessibility Standards Regulation (IASR) Employment Policy
AODA - Integrated Accessibility Standards Regulation (IASR) Information and Communications Policy
Code of Conduct Policy
Contractor Policy
Dismissal - Employee Policy
Early & Safe Return to Work Policy
Human Rights Policy
Performance Management Policy
Recruitment Policy
Termination of Employment Policy
Termination, Notice of Policy
Workplace Discrimination and Harassment Policy