



ACCESSIBILITY PLAN

for

BELMONT HOUSE

55 Belmont Street
Toronto, ON M5R1R1
416.964.9231

Updated April 2024

Message from Maria Elias, Chief Executive Officer

Belmont House is a charitable, non-profit, Christian home for seniors offering long term care and retirement living. For more than 160 years, we have provided quality care to our residents and assisted living for our tenants, in a safe and stimulating home environment. We are the "Seniors' Home of Choice" – helping our residents maintain their independence, choice, dignity and privacy.

Situated in one of the last remaining green spaces in the heart of downtown Toronto, Belmont House provides a wide range of recreational activities, therapeutic programs and health care services for those living here and members of our community.

With the introduction of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Belmont House is committed to providing a barrier-free environment for our clients/customers, patients, students, employees, job applicants, suppliers, visitors, and other stakeholders who enter our premises and access our information. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and the Integrated Accessibility Standards Regulation for Information and Communications, Employment, and Transportation, and eventually, for the Built Environment.

Approximately 1.8 million Ontarians live with a disability, and as the population grows older, this number will also increase. Our organization has made a commitment to accessibility for everyone who uses our services because this makes good business sense, and it is also a legal obligation. Belmont House has an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance with accessibility legislation by incorporating policies, procedures, equipment requirements, training for employees, and best practices. We will review these policies and practices on a regular basis. Our commitment to making our organization accessible to everyone includes the integration of accessibility legislation with our policies, procedures, programs, and training. We are committed to reviewing and incorporating the following information with our employees:

- Legislation regarding the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005.
- Integrated Accessibility Standards for Information and Communications, Employment, and Transportation.
- Accessible employment practices such as recruitment, assessment, and selection.
- Developing emergency response plans and individual workplace accommodation plans for employees with disabilities.
- Customer service standards.
- Accessible communication supports and information formats (both digital and non-digital).
- Communicating with people with various forms of disabilities.
- Accessible websites and web content.
- Assistive devices, mobility aids, service animals and support persons.

- Transportation vehicles and equipment requirements.
- Notices of service disruptions (temporary or long-term).
- Belmont House' relevant policies and procedures regarding accessibility.
- Reporting procedures.
- Training procedures.

Belmont House realizes that providing accessible and barrier-free environments for everyone is a shared effort. As a community, all businesses and services must work together to make accessibility happen. For more detailed information on our accessibility policies, plans, and training programs, please contact the Human Resources Department.

Sincerely,

Maria Elias
Chief Executive Officer

BELMONT HOUSE ACCESSIBILITY POLICY: STATEMENT OF ORGANIZATIONAL COMMITMENT

SUMMARY

Belmont House recognizes that the Government of Ontario supports the full inclusion of persons with disabilities as set out in the Ontario Human Rights Code (the “Code”), and the Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”). It is the goal of the Ontario government to make Ontario accessible by 2025.

Under the AODA and its Regulations, the following accessibility standards set requirements that are applicable to Belmont House

- Customer Service;
- Information and Communications;
- Employment; and
- Proposed Accessibility Standards for the Built Environment

COMMITMENT

Belmont House is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same goods and services, in the same place and in a similar way as other customers.

Belmont House is committed to ensuring that every employee and customer receives equitable treatment with respect to employment and services, without discrimination, and receives accommodation where required, in accordance with the provisions of the Code and the AODA and its Regulations. Belmont House will meet the accessibility needs of persons with disabilities in a timely manner.

POLICY APPLICATION

This policy applies to all individuals entitled to the protections set out in the AODA and its Regulations.

DEFINITION OF DISABILITY

The AODA defines “disability” as:

“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.”

The AODA uses the same definition of “disability” as the Ontario Human Rights Code which includes both visible and non-visible disabilities

Where required, Belmont House will consult with the disabled individual to understand his or her needs, and then make all reasonable efforts to meet those individual needs in a timely manner.

ACCESSIBILITY OBJECTIVES

Our objective is to prevent and remove barriers to accessibility and to meet the requirements under the AODA and its Regulations.

ACCESSIBLE FORMATS

Belmont House will ensure that all of the aforementioned documents are available in accessible formats upon request.

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

OVERVIEW OF PROGRAM

1. AODA information is posted externally at www.belmonthouse.com (main page under Accessibility).

AODA information 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.

AODA information can be sent to third parties in various accessible formats as described above or with communication supports upon request.

2. 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.

AODA will be a standing item on the agenda to discuss at each JHSC meeting.

3. 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.
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.
- 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.

FOUR CORE PRINCIPLES OF THE AODA

DIGNITY:

Policies, procedures and practices that respect the dignity of a person with a disability are those that treat them as customers and clients who are as valued and as deserving of effective and full service as any other customer. They do not treat people with disabilities as an afterthought or force them to accept lesser service, quality, or convenience. Service delivery needs to take into account how people with disabilities can effectively access and use services and show respect in these methods.

INDEPENDENCE:

In some instances, independence means freedom from control or influence of others – freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor. A staff person should not hurry them or take over a task for them if they prefer to do it themselves in their own way.

INTEGRATION:

Integrated services are those that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, practices and procedures are designed to be accessible to everyone including people with disabilities. Sometimes integration does not serve the ends of all people with disabilities. Alternative measures, rather than integration, might be necessary because the person with a disability requires it or because you cannot provide another option at the time. If

you are unable to remove a barrier to accessibility, you need to consider what else can be done to provide services to people with disabilities.

EQUAL OPPORTUNITY:

Equal opportunity means having the same chances, options, benefits and results as others. In the case of services it means that people with disabilities have the same opportunity to benefit from the way you provide goods or services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or more inconvenience.

ACCESSIBILITY OBJECTIVES

Our objective is to prevent and remove barriers to accessibility and to meet the requirements under the AODA and its Regulations.

Belmont House will comply with the following five objectives in developing the Accessibility Plan:

1. Describe the process by which Belmont House will identify, quantify, remove and prevent barriers to people with disabilities.
2. Review the initiatives pursued by Belmont House to remove and prevent barriers in the past, and identify the extent to which Belmont House has met those initiatives.
3. List areas by-laws, policies, programs, practices and services that Belmont House will review in the upcoming fiscal year to identify barriers to persons with disabilities.
4. Describe the measures that Belmont House will pursue in the upcoming fiscal year to identify, quantify, remove and prevent barriers to people with disabilities
5. Describe how Belmont House will make its accessibility plan available to the public

Belmont House is responsible for:

- Preparing an annual accessibility plan
- Making it public
- Preparing and updating accessibility policies including other policies within the Home that touch upon this topic to ensure standardization

PLANNING

All employees of Belmont House are accountable for planning, implementing and abiding by the Accessibility Plan. Supported by the Management Team, the Human Resources Department along with the Joint Occupational Health and Safety Committee will:

- Identify barriers to be removed or prevented in the coming year
- Describe how the barriers will be removed
- Work to remove barriers
- Develop an annual accessibility plan
- Make the plan available to the public

THE PROVISION OF GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Belmont House will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

ASSISTIVE DEVICES

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Belmont House.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Assistive devices provided by Belmont House: The following assistive devices are available on a first come, first serve basis and upon request, to assist customers in accessing our goods and services:

- Pocket Talkers
- Grab Bars
- Hand Railings
- Walkers
- Walking Canes
- Wheelchairs

Wheelchair access information

- All public entrances to Belmont House are accessible by wheelchair.
- Wheelchair-accessible washrooms are located in the following areas:
 - Behind Reception at the main entrance to Belmont House (main floor).
 - Near the Walker Wing entrance beside the passenger elevators on the main floor.
- The Belmont House Chapel is accessible by wheelchair on the main floor.

Magnifying

Magnifying devices are located in the tenant library, which increases the size of words on a printed document.

Elevators

Belmont House east and west building are equipped with elevators and are accessible to those in wheelchairs, as well as individuals with vision impairment (oversized buttons are imprinted with braille).

GUIDE DOGS, SERVICE ANIMALS AND SERVICE DOGS

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas:

A customer with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below), Belmont House will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws:

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Belmont House may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Belmont House will make all reasonable efforts to meet the needs of all individuals.

SUPPORT PERSONS

If a customer with a disability is accompanied by a support person, Belmont House will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations Belmont House will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

If a customer needs a support person provided by Belmont House to assist, this will be provided at no cost.

EMERGENCY ACCOMODATIONS

Belmont House is committed to ensuring the safety of all parties in the Home. In the event of an emergency, Belmont House will develop individual accommodation emergency plans with employees, students, volunteers and frequent visitors who have a disability that could prevent them from remaining safe in the event of an emergency. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

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.

The individual will be involved in the process including meeting with Human Resources, having a union representative present (if applicable), providing information they deem appropriate including 3rd party medical information from a professional of their choice and having an opportunity to provide input or feedback. If an evaluation is needed by a medical or other expert, Belmont will pay the cost.

At a minimum, all individual accommodation plans which cover emergency response information will be reviewed once per year by HR with the individual to ensure documentation on file is accurate, current and all parties understand and agree with the accommodations put in place (in this instance for emergency situations).

Otherwise, the information will be reviewed at the time when:

- The employee moves to a different physical location in the organization;

- The employee's overall accommodation needs or plans are reviewed; and/or
- Belmont House reviews general emergency response policies.

Accommodations required will be documented on the following forms:

- Belmont House Accommodation Emergency Response Form
- Belmont House Individual Emergency Response Plan – Overview List

The information above is available upon request.

The Joint Occupational Health & Safety Committee are responsible for the development and maintenance of the Emergency Response Plan Document (Integrated Standards Compliant) which refers to the following policies and programs used in emergency situations:

- Fan Out Program
- Pandemic Planning Policy
- Medical Emergencies – Code Blue Policy
- Evacuation Crisis – Code Green Policy
- Intruder – Code Purple Policy
- Violent Behavior – Code White policy
- Bomb Threat – Code Black Policy
- Missing Person – Code Yellow Policy
- Evacuation Precautionary – Code Green (Light) Policy
- Fire – Code Red Policy
- External Disaster – Code Orange Policy

TUCK SHOP

Tuck Shop volunteers are available to assist customers making a purchase in all aspects.

NOTICE OF DISRUPTIONS IN SERVICE

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Belmont House. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Belmont House' goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notifications Options:

When disruptions occur, Belmont House will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance (Front Desk) and the nearest accessible entrance to the service disruption and/or on the Belmont House website (www.belmonthouse.com);
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

FEEDBACK

Belmont House shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the Belmont House external website (www.belmonthouse.com), on the premises at Front Desk or to Human Resources (HR).

Submitting Feedback:

1. Front Desk can receive feedback in the following manner:
 - Feedback forms which can be submitted (anonymous or not) in the feedback box at Front Desk
 - Verbally (in person or by telephone)
 - Written (hand written by customer, written by Front Desk on behalf of customer, delivered)
2. The Belmont House website can be used to submit feedback via:
 - Email
 - On the Website (message can be sent and then viewed internally by appropriate parties)

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Belmont House employee

3. Customers can submit feedback by email, regular mail, courier, telephone or any other mean to:
 - Socrates Theophylactou, Director Human Resources and Customer Service
55 Belmont Street
Toronto, ON Canada M5R1R1
416.964.9231 ext 391
stheophylactou@belmonthouse.com
www.belmonthouse.com

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted provided they leave their personal contact information (this is option and not mandatory).

All other requests to provide feedback in any other not stated above can be made to the Human Resources Department at Belmont House who will accommodate such requests.

Belmont House will endeavor to respond within three (3) business days.

TRAINING

Training will be provided to:

- a) All employees, volunteers, students, agents and/or contractors who deal with the public or other third parties that act on behalf of Belmont House.
- b) Training will also be provided to individuals who are responsible for developing, reviewing and maintaining Belmont House's policies (Joint Occupational Health & Safety Committee and HR), and all other persons who provide goods, services or facilities on behalf of Belmont House.
- c) Front Desk will be provided additional specific training on customer service as they have responsibilities dealing with the public regarding feedback, requests for alternate formats, making signs for elevators out of service (posting alternate arrangements to access services), allowing guide dogs in the building and obtaining devices for those that need additional assistance when arriving for a visit.

The training requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, will be the focus as it applies to the provision of goods and services to the public or other third parties.

- d) Tuck Shop personnel will also be given additional training in line with Front Desk training on AODA to ensure customers are served appropriately in a manner that respects their disabilities.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- (Belmont House)'s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Belmont House will provide training as soon as practicable. Specifically for staff, volunteers and students, this will be their first day at Belmont House as part of their orientation as they deal with the public.

Training will be done on a recurring basis to ensure all parties are familiar with all aspects of AODA and when revisions are made to the training program as a result of changes to legislation, procedures and/or practices.

Record of Training:

Belmont House will keep a record of training that includes the dates training was provided and the number of people who attended the training.

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

NOTICE OF AVAILABILITY AND FORMAT OF DOCUMENTS

Belmont House shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Belmont House, the Belmont House' website and/or any other reasonable method.

WEBSITE

Belmont House ensures that our website and all web content published after January 1, 2012 conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance if changes are made.

Update (May 2021): Please note that the external website was replaced in its entirety as of May 2021 and is compliant with this guideline.

INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) EMPLOYMENT POLICY

Recruitment, Assessment and Selection

Belmont House notifies employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants are informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Belmont House consults with the applicant and provides suitable accommodation.

Successful applicants are made aware of Belmont House's policies and supports for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

Belmont House ensures that employees are aware of the Homes policies for employees with disabilities and any changes to these policies as they occur.

Upon employee request, Belmont House provides for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

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

Accessible formats can include large print, digital files, audio but other formats can be arranged upon request.

Documented Individual Accommodation Plan

Belmont House developed written processes for documenting individual accommodation plans for employees with disabilities.

Performance Management and Career Development and Advancement

Belmont House will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Return to Work

Belmont House has an Early and Safe Return to Work Program for employees who are absent to a disability and require accommodations in order to return to work. The process will be documented accordingly for the employee and employer's referral.

Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

MULTI YEAR ACCESSIBILITY PLAN

Belmont House will review and update its accessibility plan at least once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Status reports throughout each year will be prepared and presented by Joint Occupational Health and Safety Committee (JHSC) which includes Human Resources on the progress of the steps taken to implement Belmont House' accessibility plan. Progress will be documented in minutes at both JHSC and Senior Management meetings and in other documents including Company Newsletters and a summary document will be prepared for external users accordingly. Status report for external users will be in an accessible format.

MULTI-YEAR ACCESSIBILITY PLAN
2023 to 2028

(previous and current goals listed below)

GENERAL

This section of the Regulation requires Belmont House to:

- Develop and maintain an accessibility policy and a multi-year accessibility plan
- 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
Accessibility Policies			
Develop and implement Integrated Accessibility Standard Policy	January 1, 2012	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.	Completed – Director, HR
File accessibility (compliance) reports with the Government of Ontario	December 31, 2023	Completed by deadline. Additional supporting documentation and modification of program/policies completed in Winter and Spring of 2024	Completed – Director, HR
Make the policy publicly available and provide in an accessible format upon request	January 1, 2012	www.belmonthouse.com 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. Reviewed: May 2021, December 2023, April 2024	Completed – Director, HR
Review and update as required	Ongoing	Reviewed: December 2016, May 2021, December 2023, April 2024	Completed – Director, HR & Joint Occupational H&S Committee
Develop a multi-year accessibility Plan			
A Multi-Year Accessibility Plan was developed	January 1, 2012	Reviewed: December 2016, May 2021, December 2023, April 2024	Completed – Director, HR
Post Multi-Year Accessibility Plan on website and provide in an accessible format upon request	January 1, 2012 Ongoing	www.belmonthouse.com Reviewed: December 2016, May 2021, December 2023, April 2024	Completed – Director, HR
Review and update the plan at least once every five years	Ongoing December 31, 2028	Reviewed: December 2016, May 2021, December 2023, April 2024 Multi Year Plan updated at the request of AODA Compliance in April 2024.	Completed – Director, HR & Joint Occupational H&S Committee
Self-Service Kiosks			
Process was developed as guidance for employees to have	January 1, 2014	Belmont House will ensure accessibility features are incorporated when procuring or acquiring	Completed – Director, HR

regard for the needs of persons with disabilities when procuring or acquiring self service kiosks		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 these accessibility features of service kiosks for persons with disabilities.	
Ongoing. New kiosks introduced in 2019 (Parking) and 2021 (COVID-19 Screening Devices) require the assistance of 3rd parties (Front Desk) for the visually impaired			

Training

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	January 1, 2015	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. Reviewed: May 2021, December 2023, April 2024	Completed – Director, HR
Update and implement training material	December 31, 2024		Completed – Director, HR & Joint Occupational H&S Committee
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.	December 31st in 2024, 2025, 2026, 2027, 2028	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.	Ongoing, Joint Occupational Health & Safety Committee
Keep record of the dates of training and the individuals who received the training.	January 1, 2012	Belmont House ensures completion training is tracked and recorded. Reviewed: May 2021, December 2023	Completed and Ongoing Education Committee (Surge)

INFORMATION AND COMMUNICATION STANDARDS

<p>This section of the Regulation includes requirements related to:</p> <ul style="list-style-type: none"> • Accessible feedback processes • Accessible formats and communication supports • Publically available emergency procedures, plans, public safety information

- Accessible Websites and web contents

ITEM	DEADLINE	ACTION TAKEN	PLANNED ACTION
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. Reviewed: May 2021, December 2023	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. Reviewed: May 2021, December 2023. This is to be assessed per request.	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. Ongoing.	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	www.belmonthouse.com Reviewed: May 2021, December 2023, April 2024. Website updated Spring 2021 with new website introduced.	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	<i>Belmont House has been in compliance since January 1, 2012.</i> -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	Completed – Joint Occupational Health & Safety Committee

		Reviewed: May 2021, December 2023, April 2024. This is to be assessed per request.	
Accessible websites and web content			
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).	January 1, 2014 or 2021 if no changes made	*Required compliance date January 1, 2014 – WCAG 2.0 Level A for New internet websites or websites that are extensively changed. Updated December 2020. Changes Reviewed May 2021, December 2023. 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. Website provider changed in late 2020 and new website launched in early 2021. New website is compliant with AODA standards.	Completed – Foundations Coordinator, Senior Management
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.	January 1, 2014 or 2021 if no changes made	If Belmont makes changes, the website will need to be compliant immediately. Otherwise January 1, 2021.* Updated December 2020. Changes Reviewed May 2021, December 2023.	Completed – Foundations Coordinator, Senior Management
EMPLOYMENT STANDARDS			
This section of the Regulation includes requirements related to: <ul style="list-style-type: none"> • 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
Obtaining service – Make service counters, queuing guide and waiting areas accessible			
Review and update existing recruitment, policies, procedures and processes	January 1, 2016.	Belmont House has reviewed and modified existing recruitment policies, procedures, processes and templates Reviewed: May 2021, December 2023.	Completed – Director, HR
Specify that accommodations is available for applicants with disabilities on the website and on job postings	January 1, 2016	Recruitment: 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. Website and job postings (internal and external) reflects AODA requirements Reviewed: May 2021, December 2023.	Completed – Director, HR
Inform applicants about the availability of accommodations: when called for an interview,	January 1, 2016	Accommodation notice must be included as part of the recruitment process (scheduling of	Completed – Director, HR

during the selection process, at the time of the job offer and as soon as practicable after the new employee begins, specifically at orientation		interview, assessment process, location of interview) Reviewed: May 2021, December 2023.	
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.	January 1, 2016	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 Reviewed: May 2021, December 2023.	Completed – Director, HR
Informing employees of support			
Inform current employees and new hires as soon as practicable after they begin employment of policies supporting employees with disabilities.	January 1, 2016	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. Reviewed: May 2021, December 2023, April 2024.	Completed – Director, HR
Keep employees up to date on changes to policies/procedures relating to accommodations.	January 1, 2016 May 31, 2024	Communication channel used for staff – internal newsletters and paystub notices. Reviewed: May 2021, December 2023. Communicate and distribute updated policies.	Completed – Director, HR Director, HR
Accessible formats and communication supports for employees			
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	January 1, 2016	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	Completed – Director, HR

<p>supports needed to perform the employee's job.</p>	<p>April 23, 2024</p>	<p>-appropriate documentation will be provided by the employee to assist with creating an accurate plan. -Belmont may request a 3rd party medical expert at Belmont's expense in determining if accommodation can be achieved -employee may include a representative of their choosing in this process (example – union rep) -steps taken to maintain the employee's privacy -frequency plan will be revisited/reviewed/updated -If plan is denied, an explanation will be provided</p> <p>Reviewed: May 2021, December 2023, April 2024.</p> <p>-clarified plan and policies on accessible formats and communication support.</p>	<p>Director, HR & Joint Occupational Health & Safety Committee</p>
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Workplace emergency response information

<p>Individualized workplace emergency response information procedures have been developed for employees with disabilities</p>	<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>Reviewed: May 2021, December 2023, April 2024.</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 & Joint Occupational Health & Safety Committee</p> <p>Director, HR</p>
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<p>Conduct Mock Emergency Drill</p>	<p>December 31, 2025</p>	<p>To ensure compliance with the program requirements.</p>	<p>Joint Occupational Health & Safety Committee</p>
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Documented individual accommodation plans/Return to Work Process

<p>Create a written process for the development of documented individual accommodation plans and return to work plans for employees with disabilities</p>	<p>January 1, 2016</p>	<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><u>Documented Individual Accommodation Plans/Return to Work Process: Belmont House</u></p>	<p>Completed – Joint Occupational Health & Safety Committee</p>
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	April 23, 2024	<p>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>Reviewed: May 2021, December 2023.</p> <p>Updated policies/support material to ensure compliance with all legal requirements</p>	Completed – Director, HR & Joint Occupational Health & Safety Committee
Include in the process and plans all of the required elements in accordance with the provisions of the IASR	January 1, 2016	<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>Reviewed: May 2021, December 2023, April 2024.</p>	Completed – Director, HR
	April 23, 2024	Updated policies/support material to ensure compliance with all legal requirements.	Completed – Director, HR & Joint Occupational Health & Safety Committee
Performance Management, career development, advancement and redeployment			
Review and update existing policies, practices to ensure compliance with IASR	January 1, 2016	<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>Reviewed: May 2021, December 2023, April 2024.</p>	Completed – Director, HR & Joint Occupational Health & Safety Committee
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	January 1, 2016	<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 with disabilities as well as individual</p>	Completed – Director, HR

		<p>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</p> <p>Reviewed: May 2021, December 2023, April 2024.</p>	
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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
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	January 1, 2017	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. Reviewed: May 2021, December 2023.	Director, Support Services
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.	January 1, 2017	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. Reviewed: May 2021, December 2023.	Director, Support Services
Make parking accessible			
Where practicable, new and redeveloped parking areas meet certain technical requirements in accordance with the provisions of the IASR.	January 1, 2017	Belmont House redesigned/redeveloped parking spaces in the West Lot in 2018. 3 rd party developers used for the project who followed AODA guidelines. Disability parking spaces accessed/created based on current requirements. Reviewed: 2018, May 2021, December 2023.	Director, Support Services
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, depressed curbs, pedestrian	January 1, 2017	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. Reviewed: May 2021, December 2023.	Director, Support Services

signals, rest areas) and not to provide a recreational experience meet certain technical requirements in accordance with the provisions of the IASR.			
Make outdoor public eating areas accessible			
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
Make outdoor play spaces accessible			
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

The Human Resources along with the Joint Occupational Health & Safety Committee are responsible for creating and maintaining the Accessibility Plan along with associated policies and procedures for Belmont House.

*You may also refer to Policy “AODA Multi-Year Plan & Policies” for more information

DEFINITIONS

Accessible Formats – include but not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

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.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 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.

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.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

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.

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.

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

Web Content Accessibility Guidelines – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

AODA ISAR HELPFUL RESOURCES

- Accessibility for Ontarians with Disabilities Act http://www.aoda.ca/?page_id=1192#transdefinitions
- Accessibility for Ontarians with Disabilities Act, 2005 Ontario e-Laws http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm
- AODA Compliance Wizard (Government of Ontario): <https://www.appacats.mcsc.gov.on.ca/eadvisor/>
- Coalition for Persons With Disabilities <http://www.disabilityaccess.org>
- Compliance Manual, Guide to Accessibility Standards for Customer Service <http://209.167.40.96/page.asp?unit=cust-serv-reg&doc=workbook&lang=en>
- Council of Canadians with Disabilities <http://www.ccdonline.ca>
- Customer Waiting <http://www.customerwaiting.ca/index.php?module=blog&page=blog-view&bid=45>
- Health Protection and Promotion Act, Ontario e-Laws http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h07_e.htm
- Ministry of Community and Social Services, *Making Ontario Accessible* <http://www.mcsc.gov.on.ca/en/mcsc/programs/accessibility/index.aspx>
- One-Key Service Ontario http://www.ontario.ca/en/login/ONT03_026063
- Ontario Regulation 191/11, Ontario e-Laws http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm#BK0

- Ontario Regulation 429/07, Ontario e-Laws http://www.e-laws.gov.on.ca/html/source/regs/english/2007/elaws_src_regs_r07429_e.htm
- People Access <http://www.peopleaccess.ca/>
- Training Resource AODA, 2005
<http://209.167.40.96/page.asp?unit=cust-serv-reg&doc=training&lang=en>
- WWW Consortium Web Content Accessibility Guidelines 2.0
<http://www.w3.org/WAI/intro/wcag>