



## **Bolton Mills Retirement Community Inc. - Multi-Year Accessibility Plan – 2019 Update**

“Required Completion Dates” indicated are as per the AODA. This organization began operations effective January 2, 2019.

### **Introduction and Statement of Commitment**

The Ontario government passed the *Accessibility for Ontarians with Disabilities Act* (AODA) in 2005. It is the goal of the government of Ontario to make Ontario accessible by 2025. Bolton Mills Retirement Community Inc. is committed to complying with the *Accessibility for Ontarians with Disabilities Act, 2005* and all of the standards under it in order to meet the accessibility needs of persons with disabilities in a timely manner.

The regulations associated with the Integrated Accessibility Standards (hereafter referred to as the “IASR”) under the AODA require that effective January 1, 2014, Bolton Mills Retirement Community Inc. establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the Act.

Under the AODA, in addition to certain general standards, the following accessibility standards set certain requirements that are or may be applicable to Bolton Mills Retirement Community Inc.:

- Information and Communications;
- Employment;
- Design of Public Spaces; and
- Customer Service

This multi-year plan outlines Bolton Mills Retirement Community Inc.’s strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our



commitment as outlined in Bolton Mills Retirement Community Inc.'s Accessibility Policies.

In accordance with the requirements set out in the IASR, Bolton Mills Retirement Community Inc. will:

- Post this plan on its website ([INSERT WEBSITE NAME]);
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years

This Plan has been updated to include Bolton Mills Retirement Community Inc.'s planned Accessibility strategies for the review period beginning January 1, 2019.

## **Overview**

### Integrated Accessibility Standards Regulations

1. Emergency Procedure, Plans or Public Safety Information
2. Workplace Emergency Response Information
3. Training
4. Information and Communication Standards
  - a. Feedback, Accessible Formats and Communication Supports
  - b. Accessible Websites and Web Content
5. Employment Standards
  - a. Recruitment
  - b. Informing Employees of Supports
  - c. Documented Individual Accommodation Plans/Return to Work Process
  - d. Performance Management, Career Development and Redeployment
6. Design of Public Spaces
7. Customer Service
  - a. Establishment of Policies
  - b. Use of Service Animals and Support Persons
  - c. Notice of Temporary Disruptions



- d. Training of Staff
- e. Feedback Process
- f. Format of Documents

## **Integrated Accessibility Standards Regulation**

### **1. Emergency Procedure, Plans or Public Safety Information**

#### **Commitment:**

Bolton Mills Retirement Community Inc. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making our company premises safer for persons with disabilities during emergency circumstances.

#### **Action Taken:**

The following measures have been implemented by Bolton Mills Retirement Community Inc.:

- Emergency procedures, plans and public safety information that are prepared by Bolton Mills Retirement Community Inc. and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request;

**Required compliance date: January 1, 2012**

**Status: Completed.**

### **2. Workplace Emergency Response Information**

#### **Commitment:**

Where Bolton Mills Retirement Community Inc. is aware that an employee has a disability and that there is a need for



accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### **Actions Taken:**

The following measures have been implemented by Bolton Mills Retirement Community Inc.:

- Where the organization becomes aware of the need to accommodate an employee's disability, and if the employee's disability is such that the individualized emergency response information is necessary, Bolton Mills Retirement Community Inc. will provide individualized workplace emergency response information to the employee with the disability as soon as practicable after it becomes aware of the need.
- If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, Bolton Mills Retirement Community Inc. will provide the workplace emergency response information to the person designated by the organization to provide assistance to the employee.
- Bolton Mills Retirement Community Inc. will review the individualized workplace emergency response information when:
  - the employee moves to a different location in the organization;
  - the employee's overall accommodations needs or plans are reviewed; and/or
  - Bolton Mills Retirement Community Inc. reviews its general emergency response policies.



**Required compliance date: January 1, 2012**

**Status: Completed and acknowledged.**

**UPDATE: Actions Taken:** In 2018, Bolton Mills Retirement Community Inc. created a specific template for Emergency Response Plan information to more easily facilitate the organization's obligations under this requirement.

### **3. Accessibility Policies and Multi-Year Accessibility Plan**

#### **Commitment:**

The organization commits to making its policy documents publicly available, and will provide them in an accessible format upon request.

The organization will:

- Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;
- Post the accessibility plan on our website and provide the plan in an accessible format upon request; and
- Review and update the accessibility plan at least once every five years.

**Required Compliance Date: January 1, 2014**

**Status: Completed and acknowledged.**

**Most Recent Latest Date for Plan Review: January 1, 2019**

**Status: Completed.**



**Next Latest Date for Plan Review: January 1, 2024.**

#### **4. Self-Service Kiosks (Effective January 1, 2014)**

**Commitment:**

The organization will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

**Required Compliance Date: January 1, 2014**

**Status: Acknowledged.**

#### **5. Training**

**Commitment:**

Bolton Mills Retirement Community Inc. is committed to implementing a process to ensure that all employees, volunteers, and all other persons who provide goods, services and facilities on Bolton Mills Retirement Community Inc.'s behalf, and persons participating in the development and approval of Bolton Mills Retirement Community Inc.'s policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

**Actions Taken:**

In accordance with the IASR, Bolton Mills Retirement Community Inc.:

- Developed and provided the appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, to employees, volunteers, third-party contractors who provide goods, services



and facilities on Bolton Mills Retirement Community Inc.'s behalf, and persons participating in the development and approval of the Bolton Mills Retirement Community Inc.'s policies;

- Provided the training referenced above as soon as was practicable;
- Kept and maintains a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Will ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

**Required compliance date: January 1, 2015; Updated: July 1, 2016**

**Status: Completed and acknowledged.**

## **6. Information and Communication Standards**

### **Commitment:**

Bolton Mills Retirement Community Inc. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making applicable company information and communications accessible to persons with disabilities.

### **(i) Feedback, Accessible Formats and Communication Supports**

#### **Actions Taken:**

In accordance with the IASR, Bolton Mills Retirement Community Inc. will:

- Ensure that feedback processes are accessible to persons with disabilities by providing or arranging for the provision of



accessible formats and communications supports, upon request. The organization will notify the public about the availability of accessible formats and communication supports.

- Except as otherwise provided for under the IASR, provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities in a timely manner that takes into account the person's accessibility needs.
- Consult with the person making the request in determining the suitability of an accessible format or communication support.
- Notify the public about the availability of accessible formats and communication supports.

### **Required compliance dates:**

**January 1, 2015 – Feedback-related provisions**

**Status: Completed.**

**January 1, 2016 – Accessible Formats & Communication Supports-related**

**Status: Completed.**

### **(ii) Accessible Websites and Web Content**

#### **Actions Taken/Planned Action:**

In accordance with the IASR, Bolton Mills Retirement Community Inc. will ensure that Bolton Mills Retirement Community Inc.'s public websites and online content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A (new websites and online content) by January 1, 2014, to Level AA for all content by January 1, 2021.

**Required compliance date: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content,**





**Status: Level A – Completed and acknowledged.**

**UPDATE:** Bolton Mills Retirement Community Inc. continues to review its websites and web content for compliance with the standard and have engaged an expert outside web design firm to help Bolton Mills Retirement Community Inc. be compliant meet its obligations effective January 1, 2021, with respect to internet websites and web content.

**January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.**

**Level AA – In process.**

## **7. Employment Standards (also see “2. Workplace Emergency Response Information” above)**

### **(i) Recruitment**

#### **Commitment:**

Bolton Mills Retirement Community Inc. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making the recruitment process accessible to persons with disabilities.

#### **Actions Taken:**

In accordance with the IASR, Bolton Mills Retirement Community Inc. does the following:

#### **Recruitment General**



Bolton Mills Retirement Community Inc. notifies employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

This initially involved a review and modification of existing recruitment policies, procedures, processes and templates and presently involves specifying that accommodation is available for applicants with disabilities on Bolton Mills Retirement Community Inc.'s website and on job postings.

### **Recruitment, Assessment and Selection**

Bolton Mills Retirement Community Inc. notifies job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process.

This initially involved a review and modification of existing recruitment policies, procedures, processes and templates and presently involves:

- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consultation with the applicant and arranging for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

### **Notice to Successful Applicants**

When making offers of employment, Bolton Mills Retirement Community Inc. notifies the successful applicant of its policies for accommodating employees with disabilities.

This initially included a review and modification of existing recruitment policies, procedures, processes and templates and presently involves inclusion of notification of Bolton Mills Retirement



Community Inc.'s policies on accommodating employees with disabilities in offer of employment letters.

**Required compliance date: January 1, 2016**

**Status: Completed.**

## **(ii) Employee Supports**

### **Commitment:**

Bolton Mills Retirement Community Inc. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of informing employees of available accessibility supports.

### **Actions Taken:**

In accordance with the IASR, Bolton Mills Retirement Community Inc.:

- Informs 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.
- Provides the information required to new employees as soon as practicable after they begin their employment.
- Provides updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.
- Where an employee with a disability requests it, consults with the employee to provide or arrange for the provision of accessible formats and communication supports for:



- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.
- Bolton Mills Retirement Community Inc. consults with the employee making the request in determining the suitability of an accessible format or communication support.

**Required compliance date: January 1, 2016**

**Status: Completed.**

### **c. Documented Individual Accommodation Plans/Return to Work Process**

#### **Commitment:**

Bolton Mills Retirement Community Inc. is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of improving accommodation and return to work processes in the workplace.

#### **Actions Taken:**

Bolton Mills Retirement Community Inc.'s existing policies were reviewed to include processes that Bolton Mills Retirement Community Inc. follows to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

Bolton Mills Retirement Community Inc. reviewed and assessed the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.



Bolton Mills Retirement Community Inc. also ensures that the process for the development of documented individual accommodation plans includes the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual basis.
- The manner in which Bolton Mills Retirement Community Inc. can request an evaluation by an outside medical or other expert, at Bolton Mills Retirement Community Inc.'s expense, to assist Bolton Mills Retirement Community Inc. in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans:



- If requested, include any information regarding accessible formats and communications supports provided, as required in the Standard;
- If required, include individualized workplace emergency response information, as required in the Standard; and
- Identify any other accommodation that is to be provided.

Bolton Mills Retirement Community Inc. ensures that the return to work process as set out in its existing policies outlines the steps Bolton Mills Retirement Community Inc. will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

**Required compliance date: January 1, 2016**

**Status: Completed.**

#### **d. Performance Management, Career Development and Redeployment**

##### **Commitment:**

Bolton Mills Retirement Community Inc. takes into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities;
- When providing career development and advancement to its employees with disabilities;
- When redeploying employees with disabilities.

##### **Actions Taken:**

In accordance with the IASR, Bolton Mills Retirement Community Inc. will:



- Reviews, assesses and, as necessary, modifies existing policies, procedures, practices and templates to ensure compliance with the IASR;
- Takes the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - Assessing performance
  - Managing career development and advancement
  - Redeployment is required

**Required compliance date: January 1, 2016**

**Status: Completed.**

## **8. Design of Public Spaces Standard (Accessibility Standards for the Built Environment)**

Bolton Mills Retirement Community Inc. follows the standards set out in the Design of Public Spaces Standard in circumstances where it qualifies as an obligated organization under the Act and constructs or redevelops any public space to which the Act applies.

Bolton Mills Retirement Community Inc.'s company policies for preventive and emergency maintenance apply equally to the accessible elements of any public spaces within our built environment to which the Act applies.

Where accessible elements attached to any public spaces to which the Act applies are not in working order due to temporary disruptions, the organization will issue a public notice in a timely manner in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities. The notice will include the reason of the disruption, the anticipated duration, and a description of alternative facilities or service, if any, that may be available.



**Required compliance date: January 1, 2017**

**Status: Completed.**

## **9. Customer Service Standard**

### **Commitment:**

The Customer Service Standard was created to establish accessibility standards for customer service in Ontario. In keeping with this regulation, the organization is committed to providing respectful services that focus on the unique needs of the individual.

To achieve this, the organization makes reasonable efforts to ensure that its policies, procedures and practices pertaining to the provision of goods and services to the public and other third parties adhere to the following guiding principles as set out in the IASR.

- Our goods and services must be provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of our goods or services to persons with disabilities and others must be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
- Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.

### **Actions Taken:**

The following measures have been implemented by Bolton Mills Retirement Community Inc.:

- Ensuring that the updated requirement (see reference to July 1, 2016 update below) that every person who is an employee





of, or a volunteer with, Bolton Mills Retirement Community Inc., every person who participates in developing Bolton Mills Retirement Community Inc.'s policies and every other person who provides goods, services or facilities on behalf of Bolton Mills Retirement Community Inc., receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities.

- Ensuring completion of accessibility training is tracked and recorded;
- Ensuring staff are trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing the Bolton Mills Retirement Community Inc.'s goods or services;
- Ensuring customers accompanied by a guide dog or other service animal in areas of Bolton Mills Retirement Community Inc. open to the public and other third parties, are accommodated. In regards this requirement, the organization also implemented the updated requirement (see reference to July 1, 2016 update below) expanding the list of regulated health professionals able to authorize a service animal;
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated. In regards this requirement, the organization also implemented the updated requirement (see reference to July 1, 2016 update below) with respect to consulting with the person with the disability about the need for a support person and that such support person may only required by the organization under the circumstances described in the Act.
- Issuing a public notice in a timely manner in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities. The notice must include the reason of the disruption, the anticipated duration, and a description of alternative facilities or service, if any, that may be available.
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication methods.



- In regards to accessible formats and communications supports, the organization implemented the updated requirement (see reference to July 1, 2016 update below) that the organization shall, on request, and in consultation with the person making the request, provide or arrange for the provision of the document, or the information contained in the document (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.

**Required compliance date: January 1, 2012; Updates July 1, 2016 to noted sections.**

**Status: Completed.**

## **10. Compliance**

### **Actions Taken/Planned Action:**

Bolton Mills Retirement Community Inc. will file accessibility reports required under the Act in accordance with the provisions contained in the Act using the Accessibility Compliance Reporting Tool.

**Previous compliance dates: December 31, 2014 and December 31, 2017**

**Next required compliance date: December 31, 2020**

**Final required compliance date December 31, 2023**

**Status: Compliant and on schedule.**