ACCESSIBILITY POLICY

SUMMARY

Kristus Darzs Latvian Home 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 under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) (IASR).
It is the goal of the Ontario government to make Ontario accessible by 2025.

The Integrated Accessibility Standards Regulation

The Integrated Accessibility Standards Regulation (IASR), is a key part of the Accessibility for Ontarians with Disabilities Act (AODA). It sets out specific requirements to improve accessibility in five areas: information and communications, employment, transportation, design of public spaces, and customer service. The IASR provides clear guidelines for organizations across Ontario, including businesses, non-profits, and public sector bodies, to remove barriers and make their services, facilities, and information accessible to people with disabilities. By establishing compliance deadlines and standards, the IASR helps ensure organizations take proactive steps to meet the AODA's goal of full accessibility by 2025.

Under the AODA and IASR, the following accessibility standards are applicable to Kristus Darzs Latvian Home:

- Customer Service Standard;
- Information and Communications Standard;
- Employment Standard; and
- Design of Public Spaces Standard (Proposed Accessibility Standards for the Built Environment)

The Ontario Human Rights Code

The Ontario Human Rights Code (HRC) and the Accessibility for Ontarians with Disabilities Act (AODA) work together to protect the rights of people with disabilities and make Ontario more accessible. The Human Rights Code is a law that makes sure no one is treated unfairly in areas like work, housing, or services because of things like a disability. It ensures that people with disabilities are treated equally and given accommodations to help them fully participate.

In relation to the AODA, the Human Rights Code provides the basic rules that support the specific accessibility standards under the AODA. While the AODA focuses on making organizations more accessible in areas like customer service and public spaces, the Human Rights Code makes sure these actions respect the rights and dignity of people with disabilities. If there's ever a conflict, the Human Rights Code takes priority, meaning organizations must

follow both the AODA and the broader rules of the Code to ensure fair treatment for everyone.

COMMITMENT

Kristus Darzs Latvian Home is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

Kristus Darzs Latvian Home is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Kristus Darzs Latvian Home understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Kristus Darzs Latvian Home is committed to excellence in serving and providing goods, services and facilities to all customers including people with disabilities.

Our accessible customer service policy is consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

POLICY APPLICATION

This policy applies to all Kristus Darzs Latvian Home staff, all persons who participate in developing the organization's policies; and all other persons who provide goods, services or facilities on behalf of the organization.

CUSTOMER SERVICE STANDARD

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, Kristus Darzs Latvian Home 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.

"Timely manner" refers to providing services, information, or accommodation as quickly as reasonably possible, considering the urgency of the need and the nature of the accommodation required. It means that any accessibility measures or adjustments should be implemented without unnecessary delay. The specific timeframe may vary depending on the situation.

THE PROVISION OF GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Kristus Darzs Latvian Home 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.

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 polices, practices and procedures are designed to be accessible to everyone including people with disabilities. Sometimes integration does not service the needs 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.

CHANGES TO EXISTING POLICIES

Any policies of Kristus Darzs Latvian Home that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

USE OF SERVICE ANIMALS

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

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

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Kristus Darzs Latvian Home may request verification from the customer. A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

"No pet" policies do not apply to guide dogs, service animals and/or 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. If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

• explain why the animal is excluded

• discuss with the customer another way of providing goods, services or facilities.

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), Kristus Darzs Latvian Home 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.

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 Kristus Darzs Latvian Home will make all reasonable efforts to meet the needs of all individuals.

USE OF SUPPORT PERSONS

If a customer with a disability is accompanied by a support person, Kristus Darzs Latvian Home 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.

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

NOTICE OF DISRUPTIONS IN SERVICE

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Kristus Darzs Latvian Home. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Kristus Darzs Latvian Home goods or services, reasonable efforts will be made to provide advance notice. In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Kristus Darzs Latvian Home will notify customers promptly.

Notifications will include:

In the event that a notification needs to be communicated, 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, Kristus Darzs Latvian Home will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption
- providing written notices to residents
- sending email communication to families
- verbally notifying customers; or
- by any other method that may be reasonable under the circumstances.

The notice will be made publicly available by posting the notice at the main entrance and the nearest accessible entrance to the service disruption

ACCESSIBLE FORMATS

Information can be made available in a larger font, or an enlarger can be provided. Upon request information can be explained verbally or an audio enhancing device is available from the Program department.

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

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 Kristus Darzs Latvian Home.

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, due to the physical layout of the building (narrow hallways and doorways), Kristus Darzs Latvian Home is not able to accommodate the use of motorized wheelchairs in the Home. Instead, the individual will be able to use manual wheelchair prescribed to them by an Occupational Therapist.

Assistive devices available at Kristus Darzs Latvian Home:

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:

- Walkers (limited number)
- Wheelchairs (limited number)
- Lifts
- Bed rails
- Handrails
- Adaptive utensils, cups and plates
- Tub chairs
- Magnifying technology (located in the basement)
- Audio enhancers
- Multi-level tables
- Raised toilet seats

Wheelchair access information

- All public entrances to Kristus Darzs Latvian Home are accessible by wheelchair.
- Wheelchair-accessible washrooms are located in the following areas:
  - Main lobby guest washroom
  - Basement level guest washrooms accessible by elevators.

Elevators

Kristus Darzs Latvian Home elevators are equipped with oversized buttons imprinted with braille. Both elevators are wheelchair accessible.

TRAINING

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

Training shall be provided on accessibility as relates to their specific roles to:

- our employees and volunteers
- all persons who participate in developing the organization's policies;
- and all other persons who provide goods, services on behalf of the organization

Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policy related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.

We train every person during orientation after being hired. We provide training in respect of any changes to the policies as the changes to the legislation or our policies change.

We maintain electronic records in Surge Learning database of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

FEEDBACK

Kristus Darzs Latvian Home welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Submitting Feedback:

1. The Resident Support Services Coordinator in the Front Office can receive feedback in the following manner:

   - Verbally (in person or by telephone)
   - Written (hand written by customer, written by Resident Support Services Coordinator on behalf of customer, delivered)

2. Customers can submit feedback by email, regular mail, courier, telephone or any other means to:
   Inese Pogule
   Executive Director
   11290 Pine Valley Drive
   Woodbridge, ON
   L3L 0B1

905 832 3300 ext. 228
ipogule@kdlatvianhome.com

Any other requests for providing feedback, beyond the methods stated above, can be directed to the Resident Support Services Coordinator (Front Desk). To accommodate these requests, the Home may involve our Occupational Therapist.

Customers that provide formal feedback will receive acknowledgement, 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 feedback related to accessible customer service at Kristus Darzs Latvian Home will be reviewed by the Home's Management Team and response provided to the customer in writing within 10 business days.

INFORMATION AND COMMUNICATIONS STANDARD

COMMUNICATION

Customers with different disabilities may need to use certain communication methods and avoid others. For instance,

- if a customer enters with a white cane or guide dog, staff should know that this customer may not see which way they are pointing when they explain that something is "over there". Instead, staff should use other communication strategies that take a visual disability into account. Staff can audibly tap items so that the customer can hear where they are, or verbally describe their location.
- if a customer identifies as Deaf, Kristus Darzs' staff need to realize that this customer may not hear their speech, even if they speak more loudly. Better strategies include writing, or speaking naturally in a space where the customer can clearly see the staff member and potentially read their lips.
- avoid shouting, instead if appropriate, provide audio enhancing technology
- customers with the same disability may use different communication methods. For example, one customer with a speech disability may type their words into an alternative communication device while another customer may speak slowly in a quiet location.

Customers with speech, learning, intellectual, mental health, or invisible physical disabilities may also need to communicate accessibly. For instance,

- a customer with a learning disability may need a service provider to read something aloud.
- If the customer has intellectual disabilities: use plain language. Avoid jargon. Use short, simple sentences
- Speak directly rather than through a companion or the sign language interpreter who may be present

We will work with the person with disabilities to determine what method of communication works for them.

ACCESSIBLE INFORMATION AND PUBLIC SAFETY INFORMATION

When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

a) in a timely manner, taking 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.

NOTICE OF AVAILABILITY OF DOCUMENTS

Kristus Darzs Latvian Home shall notify customers that the documents related to accessible customer service are available upon request by adding disclaimers to our policy and multi-year plan and posting electronic versions of the policy and plan on Kristus Darzs Latvian Home's website.

EMPLOYMENT STANDARD

EMPLOYMENT

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an interview or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

a) information that is needed in order to perform the employee's job; and

b) information that is generally available to employees in the workplace

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The process has been

described in our policy titled Work Reintegration.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

ACCOMMODATIONS DURING AN EMERGENCY

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

a) when the employee moves to a different location (department) in the organization;

b) when the employee's overall accommodations needs or plans are reviewed; and

c) when the employer reviews its general emergency response policies.

"As soon as practicable" in the context of the AODA means taking action to implement accessibility measures or provide accommodations at the earliest possible time, given the circumstances. It allows for some flexibility based on the complexity or feasibility of the task but emphasizes acting without unreasonable delay. Kristus Darzs Latvian Home takes a proactive approach to addressing accessibility needs while considering operational constraints.

DESIGN OF PUBLIC SPACES STANDARD
(Proposed Accessibility Standards for the Built Environment)

DESIGN OF PUBLIC SPACES

We will meet accessibility laws when newly constructing or redeveloping our public spaces. Our public spaces include:

Accessible off-street parking
Sidewalks
Walkways

MULTI-YEAR ACCESSIBILITY PLAN

Kristus Darzs Latvian Home shall 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 the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) (IASR).

Kristus Darzs Latvian Home shall post the accessibility plan on their website, and provide the plan in an accessible format upon request; and review and update the accessibility plan at least once every five years.

REVIEW AND EVALUATION OF POLICY

This policy is reviewed bi-annually or more frequently if there are changes to the applicable legislation.

This document is publicly available on our website www.kdlatvianhome.com
Accessible formats are available upon request.

Appendix A
DEFINITIONS

Accessible Formats – included 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.

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.

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.

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.

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.mcss.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.mcss.gov.on.ca/en/mcss/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