



Wawel Villa Operations Manual

INTEGRATED ACCESSIBILITY STANDARDS

POLICY A-60B (A 2.10)

A 2.10 INTEGRATED ACCESSIBILITY STANDARDS

Please note: This policy was drafted using ORCA resources provided in consultation with Sherrard Kuzz LLP and adapted for Wawel Villa

PURPOSE

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with disabilities.

The *Integrated Accessibility Standards* (the “IAS”) is a regulation under the Act the purpose of which is to ensure accessibility for persons with disabilities in the areas of (i) Information and Communication, (ii) Employment, (iii) Transportation and (iv) Design of Public Spaces.

The purpose of this policy (the “Policy”) is to identify and document how WAWEL VILLA currently achieves accessibility by meeting the requirements of the IAS and how it will continue to work towards improving accessibility for persons with disabilities.

For a more detailed explanation of WAWEL VILLA’s strategy to prevent and remove barriers for persons with disabilities please refer to WAWEL VILLA’s Multi-Year Accessibility Plan (“the “Accessibility Plan”) which is available on the WAWEL VILLA website at www.wawel.org.

STATEMENT OF COMMITMENT

WAWEL VILLA is committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

1. APPLICATION

Unless otherwise limited herein, the Policy applies to all:

- i. employees and volunteers;
- ii. persons who provide goods, services and/or facilities to residents, their families and friends, the public or other third parties on behalf of WAWEL VILLA; and
- iii. persons responsible for the development of WAWEL VILLA’s policies.

This Policy does not replace or affect existing legal obligations under the *Human Rights Code* R.S.O. 1990, c. H.19, as it may be amended from time to time, or any other applicable laws respecting the accommodation of persons with disabilities.

2. DEFINITIONS

- i. **Accessible Formats** - may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.



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- ii. **Communication Supports** - may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- iii. **Disability** – means:
 - a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
 - b) a condition of mental impairment or a developmental disability,
 - c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - d) a mental disorder, or
 - e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997
- iv. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- v. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- vi. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff, when a particular job or department has been eliminated.
- vii. **Self-Service Kiosk** – means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.
- viii. **Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.
- ix. **Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making websites and web content accessible to people with a wide-range of disabilities. The IAS requires Wawel Villas to become compliant with two levels of the WCAG - Level A and Level AA.

3. IMPLEMENTATION

Responsibility for the implementation of the Policy is shared between the Administration Team and the Board of Directors. For more information please see WAWEL VILLA’s Accessibility Plan available on the Company’s website.



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4. GENERAL ACCESSIBILITY STANDARDS

I. Accessibility Plan

Compliance Deadline: January 1, 2014

WAWEL VILLA has established and implemented an Accessibility Plan, which outlines the Company's strategy to prevent and remove barriers for persons with disabilities and meet the requirements of the IAS in accordance with the timelines set out therein.

WAWEL VILLA will maintain the Accessibility Plan in accordance with the requirements of the IAS. The Accessibility Plan will be reviewed and updated at least once every five (5) years.

The Accessibility Plan is posted on WAWEL VILLA's website and will be made available in an Accessible Format upon request.

II. Training

Compliance Deadline: January 1, 2015

By January 1, 2015 (the "Compliance Deadline for Training"), WAWEL VILLA will provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.

Training will be provided on:

- i. the requirements of the IAS;
- ii. the *Human Rights Code* as it pertains to persons with disabilities; and
- iii. the AODA Policies as required by the IAS.

The content of the training will be applicable to the individual's duties.

Employees hired and volunteers accepted after the Compliance Deadline for Training will receive the required training as soon as practicable.

WAWEL VILLA will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

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

III. Self-Service Kiosk

Compliance Deadline: January 1, 2014

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

5. INFORMATION AND COMMUNICATION STANDARDS

The Information and Communication Standards do not apply to:

- i. products and product labels;



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- ii. Unconvertible information or communications; and
- iii. information that WAWEL VILLA does not control directly or indirectly through a contractual relationship.

Should WAWEL VILLA determine that information or a communication is Unconvertible it will explain why and provide the person making the request with a summary of the said information or communication.

I. Feedback Procedures

Compliance Deadline: January 1, 2015

By January 1, 2015 WAWEL VILLA will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

WAWEL VILLA will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

II. Accessible Formats & Communication Supports

Compliance Deadline: January 1, 2016

By January 1, 2016 WAWEL VILLA will, upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.

Accessible Formats and Communication Supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.

WAWEL VILLA will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and will notify the public of the availability of same.

III. Emergency Plans, Procedures or Public Safety Information

Compliance Deadline: January 1, 2012

WAWEL VILLA will provide any emergency plans, procedures or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request. Wawel Villa uses the services of Resident Counselor to aide communication with Residents.

IV. Accessible Websites and Web Content

Initial Website Compliance Deadline: January 1, 2014

Final Website Compliance Deadline: January 1, 2021



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By the Initial Website Compliance Deadline WAWEL VILLA will ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

By the Final Website Compliance Deadline WAWEL VILLA will ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.

When determining whether meeting the requirements of this section is practicable WAWEL VILLA will consider: i. the availability of commercial software or tools required to achieve web accessibility; and ii. the impact meeting the requirements of this section will have on projects planned before January 1, 2012.

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

6. EMPLOYMENT STANDARDS

The Employment Standards only apply to employees of WAWEL VILLA. They do not apply to volunteers, other unpaid individuals or contractors.

I. Recruitment/Selection/Assessment

Compliance Deadline: January 1, 2016

By January 1, 2016 WAWEL VILLA will notify the public and employees of the availability of accommodation for job applicants during the recruitment process.

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

If an applicant requests accommodation, WAWEL VILLA will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

II. Notice to Successful Applicants

Compliance Deadline: January 1, 2016

By January 1, 2016 WAWEL VILLA will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

III. Informing Employees of Supports

Compliance Deadline: January 1, 2016

By January 1, 2016 (the "Informing Employees of AODA Policies Compliance Deadline") WAWEL VILLA will inform its existing employees of its policies on supporting employees with



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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.

WAWEL VILLA will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.

All employees hired after the Informing Employees of AODA Policies Compliance Deadline will be notified of WAWEL VILLA's policies on supporting employees with disabilities as soon as practicable after commencing employment.

IV. Accessible Formats and Communication Supports for Employees

Compliance Deadline: January 1, 2016

By January 1, 2016 WAWEL VILLA will, upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.

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

V. Workplace Emergency Response Information

Compliance Deadline: January 1, 2012

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

In such a case, with the employee's consent, WAWEL VILLA will designate a colleague(s) to provide such individualized assistance and will ensure that this colleague is provided with a copy of employee's individualized emergency response information.

WAWEL VILLA will review the individualized workplace emergency response information when (i) the employee moves to a different work location; (ii) the employee's overall accommodations needs or plans are reviewed; and (iii) when WAWEL VILLA reviews its general emergency response policies.

VI. Documented Individual Accommodation Plans

Compliance Deadline: January 1, 2016

By January 1, 2016, WAWEL VILLA will have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:



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- i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- ii. The means by which the employee is assessed on an individual basis.
- iii. The manner in which WAWEL VILLA can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- iv. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- v. The steps WAWEL VILLA will take to protect the privacy of the employee's personal information.
- vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.

Where required, an employee's individual accommodation plan will include individualized workplace emergency response information as described in section.

VII. Return to Work Process

Compliance Deadline: January 1, 2016

By January 1, 2016, WAWEL VILLA will have documented a return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps WAWEL VILLA will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section 6V.

VIII. Performance Management

Compliance Deadline: January 1, 2016

By January 1, 2016, WAWEL VILLA will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.



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IX. Career Development and Advancement

Compliance Deadline: January 1, 2016

By January 1, 2016, WAWEL VILLA will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to its employees with disabilities.

X. Redeployment

Compliance Deadline: January 1, 2016

By January 1, 2016, WAWEL VILLA will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

7. DESIGN OF PUBLIC SPACES STANDARDS

WAWEL VILLA will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017. For further information on existing or planned projects to redevelop or construct new public spaces see WAWEL VILLA's Accessibility Plan.

8. QUESTIONS ABOUT THIS POLICY

For more information about the Policy or WAWEL VILLA's Accessibility Plan please contact:

Jon Grayson, Administrator
905-823-3650
jongrayson@wawel.org

Ref: Form A 2.10.1 – Multiyear Accessibility Plan



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FORM A 2.10.1

FORM : A 2.10.1 Multi-Year Accessibility Plan – Integrated Accessibility Standards (“IAS”)

This accessibility plan (drafted with ORCA resources in consultation with Sherrard Kuzz LLP) applies to private sector organizations with 50 or more employees in Ontario.

	Deliverables	Activities	Responsibility	Deadline	Action		
					Completed	In Progress	Ongoing
General: Establishing Accessibility Policies							
a) Develop, implement and maintain polices governing how Wawel Villa achieves or will achieve accessibility through meeting the requirements of the IAS. b) Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner. c) Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.	Policies	Drafting, reviewing and writing communication	Administration Team	January 1, 2014	Y		Y



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General: Accessibility Plans

<p>a) Establish, implement, maintain and document a multi-year accessibility plan, which outlines the Wawel Villa’s strategy to prevent and remove barriers and meet requirements of IAS.</p> <p>b) Post the accessibility plan on the website, if any, and provide the plan in an accessible format upon request.</p> <p>c) Review and update the accessibility plan at least once every five years.</p>	Board of Directors	Website redesign in progress		January 1, 2014	Y		Y
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General: Self Service Kiosks

<p>a) Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.</p>	n/a			January 1, 2014	N/A		
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General: Training

<p>a) Provide training on the requirements of the accessibility standards referred to in the IAS and the Human Rights Code as it pertains to persons with disabilities</p>	Training Records	Online training module HR	Human Resources	January 1, 2015	Y	Y	Y
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Information and Communications Standards: Feedback

<p>a) Ensure Wavel Villa’s processes for receiving and responding to feedback are accessible to person with disabilities by providing or arranging for accessible formats and communication supports upon request.</p> <p>b) Notify the public about the availability of accessible formats and communication supports.</p>	<p>Record of all Complaints (in Complaints binder)</p> <p>Posting at Reception</p>	<p>Feedback and complaints forms Suggestion box Resident Counselor</p> <p>Resident council meetings Posting</p>	<p>Administrator Department Supervisors</p>	<p>January 1, 2015</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>
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Information and Communications Standards: Accessible Formats and Communication Supports

<p>a) Upon request provide or arrange for accessible formats and communication supports for persons with disabilities.</p> <ul style="list-style-type: none"> ➤ Provide in a timely manner that takes into account the person’s accessibility needs due to disability; and ➤ Provide at a cost that is no more than the regular cost charged to other persons. <p>b) Consult with the person making the request to determine the suitability of an accessible format or communication support.</p> <p>c) Notify the public about the availability of accessible formats and communication</p>	<p>Posted</p>	<p>Resident Counselor</p>	<p>Administrator</p> <p>All department supervisors</p>	<p>January 1, 2016</p>	<p>Y</p>	<p>Y</p>
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Information and Communications Standards: Emergency Procedure, Plan or Public Safety Information

<p>a) Upon request provide in an accessible format or with appropriate communication supports, Wawel Villa’s emergency procedures, plans or public safety information that it makes available to the public.</p>	<p>Upon request</p>	<p>Could include translation Polish for example</p>	<p>Administration Resident Counselor</p>	<p>January 1, 2012</p>	<p>Y</p>		<p>Y</p>
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Information and Communications Standards: Accessible Websites and Web Content

<p>a) Ensure the websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0:</p> <ul style="list-style-type: none"> ➤ Level A ➤ Level AA 	<p>Website content</p>	<p>Website redevelopment in progress</p>	<p>Board of Directors and Administrator</p>	<p>January 1, 2014 (Level A) January 1, 2021 (Level AA)</p>		<p>Y</p>	
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Employment Standards: Recruitment, General

<p>a) Notify employees and the public about the availability of accommodations for applicants with disabilities in Wawel Villa recruitment process.</p>	<p>Include in job postings</p>	<p>Review and rewrite job postings to include</p>	<p>Human Resources</p>	<p>January 1, 2016</p>		<p>Y</p>	
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Employment Standards: Recruitment, Assessment or Selection Process							
a) During recruitment process, notify 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. b) If the selected applicant requests accommodation, consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs.	Include as part of hiring process	Review selection process	Human Resources	January 1, 2016		Y	
Employment Standards: Notice to Successful Applicants							
a) When making offers of employment, notify the successful applicant of Wavel Villa policies for accommodating employees with disabilities.	Include in offer letter	Review and revise offer letters	Human Resources	January 1, 2016		Y	
Employment Standards: Informing Employees of Supports							
a) Inform employees of Wavel Villa’s policies used to support employees with disabilities. b) Provide the above information as soon as practicable after the employee begins employment.	Include in employee handbook	Review and rewrite employee handbook	Human resources	January 1, 2016		Y	



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c) Provide updated information to employees whenever there is a material change to existing policies on the provision of job accommodations.							
Employment Standards: Accessible Formats and Communication Supports for Employees							
a) Upon request, consult with an employee to provide or arrange for the provision of accessible formats and communication supports for information needed to perform employees job and information generally available to employees in the workplace	On request – various	Could include polish translations	Administration team	January 1, 2016		Y	
Employment Standards: Workplace Emergency Response Information							
a) Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability. b) If the employee provides consent, provide the employee’s individualized workplace emergency response information to another person designated by the employer to provide assistance to the employee. c) Review the individualized workplace emergency response information when:	Communication	Individualized	Human Resources and employee’s supervisor	January 1, 2012	Y		Y



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<ul style="list-style-type: none"> i. the employee moves to a different work location; ii. the employee’s overall accommodation needs or plans are reviewed; and iii. when the employer reviews its general emergency response information. 							
Employment Standards: Documented Individual Accommodation Plans							
<ul style="list-style-type: none"> a) Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities that includes all of the considerations set out in section 28(2) and (3) of the IAS. 	Process	Develop individual accommodation plan template	Human Resources	January 1, 2016		Y	
Employment Standards: Return to Work Process							
<ul style="list-style-type: none"> a) Develop and have a documented a return to work process employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. b) Ensure the return to work process outlines Wavel Villa will take to facilitate the employee’s return to work and that it uses documented individual accommodation plans, if any. 	RTW process	Review and revision of RTW policies and procedures	Human Resources	January 1, 2016	Y	Y	Y



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Employment Standards: Performance Management							
a) Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying performance management.		Review performance management process	Administrator, Supervisors and Human Resources	January 1, 2016		Y	
Employment Standards: Career Development and Advancement							
a) Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to employees with disabilities.			Administrator, Supervisors and Human Resources	January 1, 2016		Y	
Employment Standards: Redeployment							
a) Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.			Administrator, Supervisors and Human Resources	January 1, 2016		Y	
Design of Public Spaces Standards: Redeployment							
a) Ensure that construction and/or redevelopment of public spaces covered by the IAS complies with applicable			Board of Directors, Administrator	January 1, 2017		Y	



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FORM A 2.10.1

accessibility requirements.							
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