

OPERATIONS MANUAL

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A 2.9: Integrated Accessibility Standards

Policy:

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

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

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 (Name of Lanark Lifestyles); and
- iii. persons responsible for the development of (Name of Lanark Lifestyles)’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.

DEFINITIONS

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.

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.

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*

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New Internet Website - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Performance Management - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

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.

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.

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.

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 organizations to become compliant with two levels of the WCAG - Level A and Level AA.

IMPLEMENTATION

Responsibility for the implementation of the Policy is shared between [enter departments]. For more information please see (Name of Lanark Lifestyles)’s Accessibility Plan available on the Company’s website.

GENERAL ACCESSIBILITY STANDARDS

I. Accessibility Plan

Lanark Lifestyles 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.

Lanark Lifestyles 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 (Name of Lanark Lifestyles)’s website and will be made available in an Accessible Format upon request.

II. Training

Lanark Lifestyles will provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.

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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.
- Lanark Lifestyles 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.
- Lanark Lifestyles 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

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

INFORMATION AND COMMUNICATION STANDARDS

The Information and Communication Standards do not apply to:

- i. products and product labels;
- ii. Unconvertible information or communications; and
- iii. information that Lanark Lifestyles does not control directly or indirectly through a contractual relationship.

Should Lanark Lifestyles 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

Lanark Lifestyles 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.

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

II. Accessible Formats & Communication Supports

Lanark Lifestyles 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.

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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.

Lanark Lifestyles 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

As of Jan 1, 2012 Lanark Lifestyles provides 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.

IV. Accessible Websites and Web Content

Lanark Lifestyles ensures that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

Lanark Lifestyles ensures 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 Lanark Lifestyles 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 Lanark Lifestyles controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

EMPLOYMENT STANDARDS

The Employment Standards only apply to employees of (Name of Lanark Lifestyles). They do not apply to volunteers, other unpaid individuals or contractors.

I. Recruitment/Selection/Assessment

Lanark Lifestyles will notify the public and employees of the availability of accommodation for job applicants during the recruitment process.

Lanark Lifestyles 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, Lanark Lifestyles 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.

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II. Notice to Successful Applicants

Lanark Lifestyles ensures that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

III. Informing Employees of Supports

Lanark Lifestyles will inform its existing employees of its policies on supporting 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.

Lanark Lifestyles 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 January 1, 2016 are and will be notified of (Name of Lanark Lifestyles)'s policies on supporting employees with disabilities as soon as practicable after commencing employment.

IV. Accessible Formats and Communication Supports for Employees

Lanark Lifestyles 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.

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

V. Workplace Emergency Response Information

If an employee has a disability and Lanark Lifestyles 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 Lanark Lifestyles becomes aware of such requirement. In such a case, with the employee's consent, Lanark Lifestyles 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

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

VI. Documented Individual Accommodation Plans

Lanark Lifestyles 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 Lanark Lifestyles 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 Lanark Lifestyles 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

Lanark Lifestyles will document 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 Lanark Lifestyles will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section OVI.

VIII. Performance Management

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

An inclusive work environment is one where everyone is treated with respect and all employees are valued for their contributions. In an inclusive workplace, colleagues and clients are treated with dignity, respect, and equality, and these values are reflected in the organization's mission and vision. Policies and procedures are implemented and managed so that employees' rights are preserved.

IX. Career Development and Advancement

Lanark Lifestyles 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

Lanark Lifestyles will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

QUESTIONS ABOUT THIS POLICY

For more information about the Policy or (Name of Lanark Lifestyles)'s Accessibility Plan please contact:
[Enter contact name and contact information]

[Ref. A 2.9.1: Multi-Year Accessibility Plan - Integrated Accessibility Standards ("IAS")]

[Ref. A 2.9.2: Guidelines: Procedure for Creating Individual Accommodation Plans ("IAP") and Return to Work Plans ("RWP")]

[Ref. A 2.9.3: The Accessibility for Ontarians with Disabilities Act Compliance Deadlines for Private Sector Organizations]

[Ref. A 2.9.4: AODA Flow Chart]

[Ref: HR Toolkit Module 7 - Return to Work]

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A 2.10: Customer Service Standards

Policy:

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 a disability.

The *Accessibility Standards for Customer Service* (“the Standards”) are part of the broader *Integrated Accessibility Standards Regulation*. The Standards have been established under the Act to ensure services and facilities are, where at all possible, equally accessible to every member of the public.

We at Lanark Lifestyles strive to provide accessible services and facilities to our residents and their families and friends. The objective of this policy (the “Policy”) is to ensure we meet the requirements of the Standards and promote their underlying core principles, described below.

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.
- ii. **Accessibility Report** – The report required to be filed pursuant to section 14 of the Act.
- iii. **Assistive Device** - Any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living.
- iv. **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.
- v. **Disability** – means:
 - i. 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 another animal or on a wheelchair or other remedial appliance or device,
 - ii. a condition of mental impairment or a developmental disability,
 - iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - iv. a mental disorder, or
 - v. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.
- vi. **Guide Dog** - A guide dog as defined in section 1 of the Blind Persons Rights’ Act is a dog trained as a guide for a person who is blind and having qualifications prescribed by the regulations under the Blind Persons’ Rights Act.

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- vii. **Service Animal** - means an animal,
- a) that can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
 - b) for which the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - A member of the College of Chiropractors of Ontario.
 - A member of the College of Nurses of Ontario.
 - A member of the College of Occupational Therapists of Ontario.
 - A member of the College of Optometrists of Ontario.
 - A member of the College of Physicians and Surgeons of Ontario.
 - A member of the College of Physiotherapists of Ontario.
 - A member of the College of Psychologists of Ontario.
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.
- viii. **Support Person** – A person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods, services or facilities.
- ix. **"We", "Our" and "Staff"** means Lanark Lifestyles and its employees, volunteers, agents and contractors.

Core Principles of the Policy

We endeavor to ensure that the Policy and related practices, policies and procedures are consistent with the following four (4) core principles:

- i. **Dignity** - Persons with a disability are as deserving of quality service as any other person and should be treated in a manner consistent with this fact.
- ii. **Equality of Opportunity** - Persons with a disability should be given an opportunity equal to that given to others to obtain, use and benefit from our services and facilities.
- iii. **Integration** - Wherever possible, persons with a disability should benefit from our services and facilities in the same place and in the same or similar manner as any other person. In circumstances where integration does not serve the needs of the person with a disability,

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services and facilities will, to the extent possible, be provided in another way that takes into account the person's individual needs.

- iv. **Independence** – Services and facilities should, where possible, be provided in a way that respects the independence of persons with a disability. To this end, we will be willing to assist but will not do so without first attempting to get the permission of the person with a disability.

Human Rights Code & AODA: Duty to Accommodate

The AODA and the Ontario Human Rights Code (the Code) both use the same definition of disability, but they also have some important differences. Under the Code, when a person with a disability needs accommodation, there is duty to accommodate to the point of undue hardship. This means organizations may need to provide an individualized response to an accommodation request.

Accommodation means not denying people jobs or services in the first place if they can be accommodated to the point of undue hardship, which means organization may need to make changes to their policies, practices and staff training so that discrimination does not occur.

The Code protects people from discrimination and harassment because of past, present or perceived disabilities. Disabilities themselves are not a barrier, but barriers exist that exclude people with disabilities. These include physical, information and communication, systemic or attitudinal barriers.

- Physical barriers include things like providing steps but no ramps or elevators
- Information and communication barriers can make it difficult for people to receive or give information
- Systemic barrier can result from stereotypes or established practices, such as inflexible hours that don't coordinate with para-transit bus schedule
- Attitudinal barriers can be the biggest barrier of all by some organizations having a tendency to see people with disabilities as less worthy and underestimating their potential

Organizations should try to identify and remove barriers before problems arise instead of waiting to answer individual accommodation requests or complaints.

Avoid creating barriers altogether through inclusive planning and design. See section on Design of Public Spaces standards below.

Resident Rights under Human Rights Code

In addition to obligations arising under the AODA, residents in your retirement Lanark Lifestyles may also have rights under the Human Rights Code. These obligations under the Human Rights Code include:

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- A retirement Lanark Lifestyles cannot refuse to let someone move into the Lanark Lifestyles simply because they have a disability, physical or mental, including depression.
- A retirement Lanark Lifestyles may have a duty to accommodate special needs arising from a disability, unless doing so would cause 'undue hardship' (as defined by the Human Right Code) for the Lanark Lifestyles.
- There may be legal requirements under the Human Rights Code about when you can request or demand additional medical information such as a psychiatric examination.

Your organization will have policies and processes outlining the procedures for resident admissions.

Please note, the information in this policy is provided for general information purposes and does not constitute legal advice. We suggest you obtain legal advice regarding your own specific circumstances.

Implementation

Lanark Lifestyles has created an Accessibility Committee responsible for:

- Developing and implementing policies aimed at providing accessible services and facilities to persons with a disability.
- Developing and implementing an accessibility training program as required by the Standards.
- Developing and implementing a feedback procedure as required by the Standards.
- Filing Accessibility Reports as required under section 14 of the Act.

Providing Services and Facilities to People with Disabilities

I. Policies

Lanark Lifestyles shall make all reasonable efforts to ensure that its policies which impact the delivery of its services and facilities to residents, their family and friends, the public or to other third parties are consistent with the principles of dignity, equality of opportunity, integration and independence as defined above.

II. Communication

Lanark Lifestyles strives to communicate with persons with a disability in a manner that takes into account the disability. Approaches for communication are set out in our accessibility training program.

III. Assistive Devices

Persons with a disability are permitted, where possible, to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our services and facilities. If there is a physical, technological or other type of barrier that prevents the use of an Assistive Device on our premises we will make efforts to provide an alternative means of assistance to the person with a disability.

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IV. Accessibility at Our Premises

We offer the following facilities and services at each Lanark Lifestyles location to which the Policy applies to enable persons with a disability to obtain, use or benefit from our services and facilities:

- (i) *Assistive devices, services or methods*
- (ii) *alternate formats of documents,*
- (iii) *assistance of a staff person to complete a form,*
- (iv) *Reading magnifier*
- (v) *chairs for waiting*
- (vi) *lifts for residents for bathing and transferring*
- (vii) *lift in pool area*
- (viii) *low counter areas*
- (ix) *door openers*

V. Service Animals and Guide Dogs

Persons with a disability may enter premises owned and/or operated by Lanark Lifestyles accompanied by a Guide Dog or Service Animal, and keep the Guide Dog or Service Animal with them, if the public has access to such premises and the Guide Dog or Service Animal is not otherwise excluded by law.

If a Guide Dog or Service Animal must be excluded by law, we explain to the person why this is the case and explore alternative ways to meet the person's needs.

VI. Support Persons

A person with a disability may enter premises owned and/or operated by Lanark Lifestyles with a Support Person and have access to the Support Person while on the premises.

Lanark Lifestyles may require a person with a disability to be accompanied by a Support Person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,

- a) a Support Person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
- b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.

Lanark Lifestyles occasionally holds functions and events for which it charges attendees an admission fee. We will ensure that, if a separate admission fee is to be charged for a Support Person, advance notice is provided of the existence and the amount of the admission fee to be charged. Where the presence of a Support Person is required, any applicable admission fee or fare will be waived for that person.

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VII. Notice of Temporary Disruptions

Lanark Lifestyles will notify residents, their friends and families and the public if there is a planned or unexpected disruption of a facility or service persons with a disability use to access our services or facilities. The notification will be made by posting a notice at the entrance of the applicable premises, on the Lanark Lifestyles page of the Lanark Lifestyles website or in some other location or by some other means as may be appropriate in the circumstances.

The notice will include the following information:

- i. That a facility or service is unavailable.
- ii. The anticipated duration of the disruption.
- iii. The reason for the disruption.
- iv. Alternative facilities or services, if available.

Training and Records

Lanark Lifestyles will ensure the following individuals receive the training required under the Standards:

- i. Every employee and volunteer
- ii. Every person who participates in developing Lanark Lifestyles policies.
- iii. Every other person who provides services or facilities on behalf of (Name of Lanark Lifestyles)

A. Content of Training

Training will include:

- i. A review of the purpose of the Act and requirements of the Standards.
- ii. A review of the Policy.
- iii. How to interact and communicate with persons with various types of disabilities.
- iv. How to interact with persons with a disability who use an Assistive Device or require the assistance of a Service Animal or Support Person.
- v. How to use equipment or devices made available on our premises to assist persons with a disability to obtain, use or benefit from our services and facilities.
- vi. What to do if a person with a disability is having difficulty accessing our premises and/or services and facilities.

B. Timing of Training

All persons to whom this Policy applies will receive the required training as soon as practicable after he or she is assigned the applicable duties. On-going training will occur as changes are made to policies, procedures and practices and as new individuals assume the applicable duties.

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C. Documenting Training

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of the Standards.

Feedback Procedure

A. Receiving Feedback

Lanark Lifestyles welcomes and appreciates feedback regarding the manner in which it provides services and facilities to persons with disabilities and regarding whether its feedback procedure is accessible to persons with disabilities. Feedback can be provided in the following ways:

- i. In person at [identify location].
- ii. By telephone at [insert telephone number].
- iii. In writing to [insert mailing address].
- iv. Electronically to [insert email address] or on a USB.

B. Responding to Complaints

Lanark Lifestyles will make reasonable efforts to resolve complaints at the time that they are made. If immediate resolution of a complaint is not possible the individual may submit a complaint to:

[Enter contact information]

Persons who wish to be contacted about their complaint must provide their contact information. The individual will then be contacted by a representative of (Name of Lanark Lifestyles).

Lanark Lifestyles will make reasonable efforts to provide responses to complaints in a manner that is accessible to the complainant.

C. Availability of Feedback Procedure

Lanark Lifestyles shall make information about this feedback procedure readily available to the public and shall make it accessible to persons with disabilities by providing, or arranging for the provision of, Accessible Formats and Communication Supports, on request.

Documentation to be made available:

This Policy and any other documentation required by the Standard shall be made available to any member of the public upon request. Notification of same shall be posted at a conspicuous place on the premises owned or operated by (Name of Lanark Lifestyles), by posting it on (Name of Lanark Lifestyles)'s website, or by such other method as is reasonable in the circumstances.

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Format of Documents

Lanark Lifestyles will provide documents, or the information contained in documents, required to be provided under the Standards, to a person with a disability in an Accessible Format or with a Communication Support upon request.

The document(s) shall be provided in a timely and in a manner that takes into account the person's accessibility needs due to disability. The documents shall also be provided at a cost that is no more than the regular cost charged to other persons.

Lanark Lifestyles shall consult with the person making the request in determining the suitability of an Accessible Format or Communication Support.

Design of Public Spaces Standards

Lanark Lifestyles will comply with the accessibility standards the Design of Public Spaces Standards (DOPS) when redeveloping or constructing new public spaces. For further information on existing or planned projects to redevelop or construct new public spaces see (Name of Lanark Lifestyles)'s Accessibility Plan.

The Ontario Building Code sets the technical requirements for building constructions. DOPS does not apply to the physical structure of the building, but does cover primarily outdoor spaces such as parking, paths of travel, service-related elements, outdoor public use eating tables, maintenance and restoration of public spaces, recreational trails and outdoor play spaces. It also includes service counters, fixed waiting lines and waiting areas with fixed seating. Responsibility for compliance falls onto the owner of this space, or the person who leases the space and who has the authority to make design decisions. Where there are physical accessibility issues in existing buildings that prevent accessing goods or services, the Customer service standard under the AODA require organizations to work with people with disabilities so they may receive accessible customer service. If you are the person who falls into this category, it is strongly recommended you refer to the link to review your responsibilities under the AODA – <http://www.ontario.ca/page/accessibility-laws>.

Accessible Parking

There are accessibility requirements under DOPS which apply to both on-street parking and off-street parking. Businesses and non-profit organizations have requirements to meet related to off-street parking only. Normally, the accessibility requirement for off-street parking falls under the municipality.

Off-street parking includes parking lots and structures intended for the temporary parking of vehicles by the public. This includes visitor parking at your communities. If you are, or have plans to add to your

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current parking lot, or reconstruct the lot entirely, the requirements under the standard set the minimum number of accessible parking spaces required, the size of the parking spaces, access aisles and

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signage requirements. These requirements are in place to ensure the needs are met for the growing number of accessible parking permit holders.

The accessibility standard provides minimum standards and does not prevent organizations from exceeding them to meet their own residents' needs. For example, the minimum width of a standard parking space, Type B, is about 7.87 feet. Communities can choose to comply with this width, or create wider spaces to accommodate residents and/or visitors that need the extra space to feel safe when exiting their vehicle. Organizations are

required to have both Type A accessible parking spaces, that are clearly identified with a 'Van Accessible' sign, and a Type B parking space. Anyone with a valid accessible parking permit can park in either of these accessible parking spaces.

Service in Public Spaces

If your retirement community has service counters in places such as reception, dining rooms or laundry rooms, there are regulations that need to be followed to ensure these services are available to all residents in your community. There must be at least one accessible service counter for each service that accommodates people with a mobility aid such as a wheelchair or scooter.

You need to make all service counters accessible if your organization has a single wait line for all services. All accessible service counters need to be clearly marked.

The fixed queuing line which may or may not lead to a service counter or other services must be wide enough to allow passage of a mobility aid and/or use of mobility devices, offer enough space for turning if the queuing line changes direction; and it must be detectable by someone using a cane for navigation.

The height of the counter must be usable for a person seated in a mobility aid with enough knee space so a forward approach can be used. The floor or ground around the accessible counter must be cleared enough with no obstructions for the person with a mobility aid to use the counter.

If there is a waiting area with fixed seating on your premises, three percent of the seating must be designed as accessible seating. There must be at least one accessible seat. This means you must leave room for people who use a mobility aid, such as a wheelchair or scooter to wait.

Click the links (on screen) for more information including best practices and a link to the regulation for:

- Service in Public Places: https://gaates.org/DOPS/section_2_7_1.php
- Queuing Lines: https://gaates.org/DOPS/section_2_7_2.php
- Waiting Areas: https://gaates.org/DOPS/section_2_7_3.php

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Recreational Trails

If your community has a public recreational trail, there are accessibility standards to ensure everyone can enjoy the natural space around your community. This doesn't apply to wilderness trails, back-country trails and portage routes, but does include multi-use trails such as a walking path that turns into a snowmobile trail in the winter.

When constructing a new recreational pathway, the organization must consult with the public including people with disabilities. When consulting, certain design elements must be addressed that might be

part of the trail such as the slope, ramps that might be needed, rest areas, passing areas, viewing areas and amenities.

Remember, you don't need to update your existing recreational trails. This accessibility standard only applies if you are constructing a new recreational trail or performing major renovations to an existing recreational trail.

For more information including detailed requirements, please go to:
https://gaates.org/DOPS/section_2_2_0.php.

Beach Access Routes

If your retirement community offers beach access, there are accessibility standards that apply. Beach access routes are public routes that provide access from off-street parking facilities, recreational trails, exterior paths of travel and amenities. These routes can be permanent or temporary and have specific technical requirements which are outlined in the standard. Temporary beach access routes can be removed and stored away during the off-season months. These requirements include minimum clear width and height, maximum running slope ratio, surface opening restrictions, minimum clear width at entrance, firm and stable surface, minimum cross slope for drainage and maximum cross slope and bevel ratios for man-made surfaces. You do not need to consult when constructing a beach access route, but you do need to comply with the requirement.

Go to https://gaates.org/DOPS/section_2_3_0.php for more detailed information about beach access routes.

Outdoor Public Use Eating Areas

If your organization has 50 or more employees and your community provides outdoor eating areas, accessible regulations outline the requirements that must be met to be compliant. For example, if you provide a picnic area for your residents and their families, the requirement sets the number of tables, the design of the eating area and the surface area. If you currently have an eating area and are not

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planning a renovation to this area, you do not need to change the area to comply. Just remember, once you renovate this area, you will need to comply with the accessibility standards.

Go to https://gaates.org/DOPS/section_2_4_0.php for more technical information regarding outdoor public use eating areas including some best practices considerations.

Exterior Paths of Travel

Promoting a healthy lifestyle with residents is a key component in care. Most retirement communities offer public pathways around the community for residents, families and staff to use. If your retirement Lanark Lifestyles has 50 or more employees, the Accessible Standard for the Design of Public Spaces standard states surfaces of exterior paths of travel must be firm, stable and slip-resistant. Firm surfaces resist dents when walked or wheeled on and stable surfaces return to their original condition once the pressure has been removed. Sidewalks and walkways should include drainage grates that won't allow canes, wheelchairs or footwear to get caught. You must also include rest areas and directional signage. There may be areas along the exterior path of your Lanark Lifestyles that is accessible to the public that have multiple changes in surface levels. For example, when the grading of the pathway that leads to the bus stop is steep due to the ground being unlevel, or have stairs which are not to the correct width, residents and/or visitors with stamina issues may have issues with going up and/or down these pathways. There are regulations for changes in levels along sidewalks and walkways to ensure the safety of your residents and visitors.

Overhead barriers or objects should be relocated or also contain a barrier around the object which will benefit all users. This may include any hanging flower baskets, flowerbeds with overgrown plants or directional signs. There are many more technical requirements for exterior pathways including ramps, curbs, stairs and railings. Ensuring the communities exterior path meets the requirements under the accessibility standard, provides your residents and their families with a safe path to enjoy a leisurely walk or exercise, while ensuring their safety.

Outdoor Play Places

If your retirement Lanark Lifestyles has 50 or more employees and offers an outdoor play area for residents to enjoy with their families when they visit, there are accessibility requirements that apply to this space. This includes play equipment and structures such as slides, swing, splash pads, etcetera; and natural features such as logs, rocks, sand or water intended for play.

Ensuring your outdoor play space is compliant with the accessibility standard for the Design of Public Spaces promotes enhanced play experiences for residents and their families.

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For more detailed information including technical specifications, go to https://gaates.org/DOPS/section_2_5_0.php

Maintenance

To ensure an accessible environment is kept safe and usable and to ensure existing public spaces are in good working order, communities should perform routine maintenance on these areas. Poor maintenance can cause accessibility barriers for people with disabilities. This requirement applies to all retirement Lanark Lifestyles in the non-profit or business sector with 50 or more employees.

Your organization must have a multi-year accessibility plan under the Integrated Accessibility Standards Regulation, or IASR. These plans will document procedures for preventative and emergency maintenance of accessible public spaces required by the standard. Within these plans, there must be documented procedures for what to do when the accessibility elements are not available, and how you plan to maintain public spaces.

You can learn more about the maintaining accessible public spaces by going to https://gaates.org/DOPS/section_3_0_0.php.

Summary

Under the AODA, the Government of Ontario is required to establish standards to remove barriers so people with disabilities can participate more fully in their communities. Ensuring organizations comply with their AODA requirements, will promote accessibility for everyone to enjoy life and participate in activities everywhere they go.

For more information about the action plans and progress report that help make Ontario a more accessible province for people with disabilities, go to <https://www.ontario.ca/page/about-accessibility-laws>.

Resources

- The Ontario Human Rights Commission: <http://www.ohrc.on.ca/en/about-commission/contact-us>
- The Human Rights Tribunal: <http://www.sjto.gov.on.ca/hrto/>
- The Human Rights Legal Support Centre: <http://www.hrlsc.on.ca/en/welcome>
- Gaates.org: Illustrated Technical Guide to the Design of Public Spaces
- Working Together videos - produced by the Ontario Human Rights Commission: <http://www.ohrc.on.ca/en/learning/working-together-code-and-aoda>

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Questions About This Policy

For more information about the Policy or for questions regarding Lanark Lifestyles policies, practices and procedures for accessible service please contact:

Shauna Rayner
Executive Director
shauna@lanarklifestyles.ca
613-706-6606

[Ref: 2.10.1 Accessibility Standards Package]- Helpful Templates

- Feedback Process
- Accessible Customer Service Feedback
- Responding to Client / Customer Feedback
- Service Feedback Tracking Log
- Accessible Documentation
- Notice of Service Disruption
- Service Animals
- Support Persons
- Staff Training Records
- Instructions for Filing an Accessibility Report

Accessibility Compliance Report

You can use one form to file an accessibility compliance report for up to 20 organizations. To do so, you need each organization's:

- legal name
- business number (BN9) or AODA identifier
- number of employees in Ontario
- address

Each organization must have the same:

- organization category
- number of employees range (e.g. 20-49, 50+)
- certifier
- answers to all of the accessibility compliance questions

If not, you will need to complete a separate form for each organization.

Note: While business and non-profit organizations with 1-19 employees are not required to submit an accessibility compliance report, they must still comply with the AODA.

Organization information

Table 1: Organization category, number of employee range and reporting year

Organization Category (required)	Number of employee range (required)	Reporting year (required)
Business or Non-profit	50+ employees	2026 BNP

Business details

How to count your employees?

In your employee count, include all:

- full-time employees
- part-time employees
- seasonal employees
- contract workers

Do not count:

- employees outside Ontario
- volunteers
- independent contractors

How can I find my CRA business number or AODA Identifier?

You can find your BN9 number by:

- Logging into the CRA My Business Account
- Checking your GST/HST or Corporation Notice of Assessment under Notice Details
- Checking your GST/HST credit notice
- To learn more, visit Business number - Canada.ca (https://www.canada.ca/en/services/taxes/business-number.html?utm_campaign=not-applicable&utm_medium=vanity-url&utm_source=canada-ca_business-number)

If you do not have a BN9, please contact aoda.assistance@ontario.ca to receive an AODA identifier.

How to find your industry?

You can search for North American Industry Classification (NAICS) codes using the Statistics Canada website (<https://www23.statcan.gc.ca/imdb/p3VD.pl?Function=getVD&TVD=1369825>).

Table 2: Organization business details (maximum up to 20)

Item Number	Organization legal name (required)	Number of employees in Ontario (required)	Business number (BN9) or AODA identifier (required)	Operating / business name	Organization Sector (required)	Subsector (required)	Industry Group (required)
Item # 1	Lanark Lifestyles Ltd.	80	787521087	Lanark Lifestyles Retirement R	62 - Health Care and Social Assistance	623 - Nursing and Residential Care Facilities	6233 - Community Care Facilities for the Elderly

Business address

Address at which letters can be sent to the company director/officer accountable for the organization's compliance with the AODA.

Table 3: Organization business address (maximum up to 20)

Item Number	Organization legal Name (required)	Address line 1 (required)	Address line 2	City (required)	Province or State (required)	Postal code or Zip code (required)	Country (required)
Item # 1	Lanark Lifestyles Ltd.	240 Gore Street East Lanark Lifestyles	N/A	Perth	ON (Ontario)	K7H 1K9	Canada

Mailing address

Address where letters can be sent to the person responsible for coordinating the organization's AODA compliance activities.

Table 4: Organization mailing address (maximum up to 20)

Item Number	Organization legal name (required)	Address line 1 (required)	Address line 2	City (required)	Province or State (required)	Postal code or Zip code (required)	Country (required)
Item # 1	Lanark Lifestyles Ltd.	240 Gore Street East Lanark Lifestyles	N/A	Perth	ON (Ontario)	K7H 1K9	Canada

Certification statement

Section 15 of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) requires that accessibility reports include a statement certifying that all the required information has been provided and is accurate, signed by a person with authority to bind the organization(s).

Note: It is an offence under the Act to provide false or misleading information in an accessibility report filed under the AODA.

The certifier may designate a primary contact for the Ministry for Seniors and Accessibility to contact the organization(s); otherwise, the certifier will be the main contact.

Certifier: Someone who can legally bind the organization(s).

Primary Contact: The person who will be the main contact for accessibility issues.

Acknowledgement

☒ I certify that all the information is accurate, and I have the authority to bind the organization (required)

Certification date (yyyy-mm-dd) (required) 2026-09-29

Certifier information

Table 5: Certifier information

Last name (required)	First name (required)	Position title (required)	Business phone number (required)	Business phone number extension	Email (required)	Alternate phone number	Alternate phone number extension	Fax number
Rayner	Shauna	Executive Director	613-706-6606	N/A	shauna@lanarklifestyles.ca	N/A	N/A	N/A

Primary contact for the organization(s)

☒ Check if the primary contact is same as the certifier

Table 6: Primary contact information

Last name (required)	First name (required)	Position title (required)	Business phone number (required)	Business phone number extension	Email (required)	Alternate phone number	Alternate phone number extension	Fax number
Rayner	Shauna	Executive Director	613-706-6606	N/A	shauna@lanarklifestyles.ca	N/A	N/A	N/A

Compliance questions

General Section

Question 1. Is your organization in compliance with all applicable requirements of the General Section?

☒ Yes ☐ No

Resources for Question 1

- Read Ontario Regulation 191/11, Part I: General (<https://www.ontario.ca/laws/regulation/110191#BK0>)
- Learn more about your requirements for question 1 (<https://www.ontario.ca/page/accessibility-rules-public-sector-organizations>)
- Accessibility Policy Sample (<https://forms.mgcs.gov.on.ca/dataset/on00090>)
- Sample Multi-year Plan Template (<https://forms.mgcs.gov.on.ca/dataset/on00091>)
- Accessibility Training Requirements Checklist (<https://forms.mgcs.gov.on.ca/dataset/on00092>)
- The Accessibility Standards Checklist (<https://forms.mgcs.gov.on.ca/dataset/on00125>)

Comments for Question (Please provide additional details to support your answer)

N/A

Information and Communications Standards

Question 2. Is your organization in compliance with all applicable requirements of the Information and Communications Standards?

☒ Yes ☐ No

Resources for Question 2

- Read Ontario Regulation 191/11, Part II: Information and Communications Standards (<https://www.ontario.ca/laws/regulation/110191#BK8>)
- Accessible Educational and Training Resources and Materials Checklist (<https://forms.mgcs.gov.on.ca/dataset/on00119>)
- World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 (<https://www.w3.org/WAI/standards-guidelines/wcag/>)
- The Accessibility Standards Checklist (<https://forms.mgcs.gov.on.ca/dataset/on00125>)

Comments for Question (Please provide additional details to support your answer)

N/A

Employment Standards

Question 3. Is your organization in compliance with all applicable requirements of the Employment Standards?

☒ Yes ☐ No

Resources for Question 3

- Read Ontario Regulation 191/11, Part III: Employment Standards (<https://www.ontario.ca/laws/regulation/110191#BK20>)
- Learn more about your requirements for question 3 (<https://www.ontario.ca/page/accessibility-rules-public-sector-organizations#section-8>)
- Sample Return to Work Process and Plan (<https://forms.mgcs.gov.on.ca/dataset/0047>)
- Sample Accommodation Process and Plan (<https://forms.mgcs.gov.on.ca/dataset/0048>)
- Providing Accessible Emergency Information to Staff (<https://forms.mgcs.gov.on.ca/dataset/on00032>)
- Accessible Recruitment Process (<https://forms.mgcs.gov.on.ca/dataset/on00031>)
- The Accessibility Standards Checklist (<https://forms.mgcs.gov.on.ca/dataset/on00125>)

Comments for Question (Please provide additional details to support your answer)

N/A

Transportation Standards

Question 4 (a). Does your organization provide transportation services, either directly or through a third party? ☒ Yes ☐ No

Question 4 (b). Is your organization in compliance with all applicable requirements of the Transportation Standards? ☒ Yes ☐ No

Resources for Question 4

- Read Ontario Regulation 191/11, Part IV: Transportation Standards (<https://www.ontario.ca/laws/regulation/110191#BK34>)

- Learn more about your requirements for question 4 (<https://www.ontario.ca/page/accessibility-rules-public-sector-organizations#section-107>)
- Transportation Standards Reference Guide (<https://forms.mgcs.gov.on.ca/dataset/on003367>)

Comments for Question (Please provide additional details to support your answer)

N/A

Design of Public Spaces Standards

Question 5. Is your organization in compliance with all applicable requirements of the Design of Public Spaces Standards?

☒ Yes ☐ No

Resources for Question 5

- Read Ontario Regulation 191/11, Part IV.1: Design of Public Spaces Standards (<https://www.ontario.ca/laws/regulation/110191#BK917>)
- Learn more about the requirements for Question 5 (<https://www.ontario.ca/page/accessibility-rules-public-sector-organizations#section-117>)
- Design of Public Spaces Standards (DOPS) Reference Guide (<https://forms.mgcs.gov.on.ca/dataset/on003357>)

Comments for Question (Please provide additional details to support your answer)

N/A

Customer Service Standards

Question 6. Is your organization in compliance with all applicable requirements of the Customer Service Standards?

☒ Yes ☐ No

Resources for Question 6

- Read Ontario Regulation 191/11, Part IV.2: Customer Service Standards (<https://www.ontario.ca/laws/regulation/110191#BK1487>)
- Learn more about your requirements for question 6 (<https://www.ontario.ca/page/accessibility-rules-public-sector-organizations#section-77>)

- The Accessibility Standards Checklist (<https://forms.mgcs.gov.on.ca/dataset/on001257>)

Comments for Question (Please provide additional details to support your answer)

N/A