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Integrated Accessibility Standards

Policy:

Lord Dufferin Centre (LDC) 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 LDC 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 LDC; and
- iii. persons responsible for the development of LDC’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

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- 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*

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 Service Workers, Resident Attendants, RPN’s, Administration, Environmental Services, and Food Services. For more information please see LDC’s Accessibility Plan available on the Company’s website.

GENERAL ACCESSIBILITY STANDARDS

I. Accessibility Plan

LDC 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.

LDC 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 LDC’s website and will be made available in an Accessible Format upon request.

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II. Training

LDC 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.
- LDC 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.
- LDC 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

LDC 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 LDC does not control directly or indirectly through a contractual relationship.

Should LDC 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

LDC 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.

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

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II. Accessible Formats & Communication Supports

LDC 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.

LDC 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, LDC 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

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

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

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EMPLOYMENT STANDARDS

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

I. Recruitment/Selection/Assessment

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

LDC 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, LDC 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

LDC 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

LDC 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.

LDC 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 LDC's policies on supporting employees with disabilities as soon as practicable after commencing employment.

IV. Accessible Formats and Communication Supports for Employees

LDC 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.

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LDC will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, LDC 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 LDC 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 LDC becomes aware of such requirement. In such a case, with the employee's consent, LDC 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

LDC 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 LDC reviews its general emergency response policies.

VI. Documented Individual Accommodation Plans

LDC 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:

- 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 LDC 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 LDC 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.

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- 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

LDC 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 LDC will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section VI.

VIII. Performance Management

LDC will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

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

LDC 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

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

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QUESTIONS ABOUT THIS POLICY

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

Dave Holwell; 519-941-8433 or dkholwell@lorddufferincentre.ca

Individual Accommodation Plan ("IAP") / Return to Work Plan

To be printed
on LDC
letterhead?

Employee Name: _____

Job Title and Department: _____

Supervisor: _____

Date Accommodation Requested/Need Identified _____

Is the employee absent from work due to disability Yes No

If yes, date employee commenced disability-related leave _____ and expected date of return _____

Date/frequency of scheduled review(s) (if any) _____

Date employee is expected to provide updated medical information _____

Medical Information Provided

Date	Medical Professional	Medical Information Provided	Outstanding Questions/Additional Medical Information Required

Description of Accommodation Measures

Job Related Tasks/Activities Affected by Disability	Accommodation Measures (e.g., hours of work, position, duties etc.)

Roles and Responsibilities

Outstanding Actions to Implement Accommodation	Assigned To	Due Date

Other Information

Employee's Signature

Date

Manager's Signature

Date

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The Accessibility for Ontarians with Disabilities Act Compliance Deadlines for Private Sector Organizations

{as at July 2017 – drafted in consultation with Sherrard Kuzz LLP}

Small Organization (“S”) defined as 1-49 employees;

Large Organization (“L”) defined as 50+ employees

** Indicates that Small Organizations are exempt from the requirement

Integrated Accessibility Standards – General Requirements

Policies, Practices, and Procedures (L: Jan. 1, 2014; S: Jan. 1, 2015)

- Develop and implement policies on how organization will achieve accessibility by meeting requirements of Regulation
- **Prepare a document describing policies, make document available to public (in accessible format) upon request

****Accessibility Plan (L: Jan. 1, 2014)**

- Establish a multi-year accessibility plan, document plan and post on website

Accessible Formats and Communication Supports (L: Jan. 1, 2016; S: Jan. 1, 2017)

- Provide, or arrange for the provision of, information in document(s) in an accessible format or with communication supports upon request in a timely manner that takes into account the person’s accessibility needs and at no additional cost. Consult with person to determine suitability of format or support.

Training (L: Jan. 1, 2015; S: Jan. 1, 2016)

- Ensure training on requirements of Regulation and *Human Rights Code* is provided to (a) employees and volunteers, (b) persons involved in development of policies and (c) persons who provided goods, services or facilities on organizations behalf
- ** Maintain records of when and to whom training is provided.

Accessibility report (If 20+ Employees) (Dec. 31, 2014)

- Prepare and file accessibility report (Small – only report on Customer Service Standard)
- File accessibility report every three years thereafter

Self-Service Kiosks (L: Jan. 1, 2014; S: Jan. 1, 2015)

- Have regard to accessibility when designing, procuring, or acquiring self-service kiosks

Customer Service Standard

Policies, Practices, and Procedures (Jan. 1, 2012)

- Establish policies, practices and procedures on providing goods, services or facilities to persons with disabilities
- Policy must address:
 - the use of assistive devices by persons with disabilities when accessing organization’s goods, services or facilities; and
 - other measures (if any) provided by organization to enable a person with a disability to access goods, services or facilities
- Obligation to communicate with persons with disabilities in a manner that takes person’s disability into account

Service Animals (Jan. 1, 2012)

- Allow a person with a disability to be accompanied by a service animal while on organization’s premises

Accessible Formats & Communication Supports (Jan. 1, 2012)

- **Prepare document(s) describing organization’s policies, practices and procedures with respect to the above requirements, and on request give a copy of document(s) to any person. Notify persons to whom the organization provides goods, services or facilities of the availability of same upon request
- Provide, or arrange for the provision of, information in document(s) in an accessible format or with communication supports upon request in a timely manner that takes into account the person’s accessibility needs and at no additional cost. Consult with person to determine suitability of format or support.

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- If service animal is excluded by law, provide service to person with a disability in another manner

Support Persons (Jan. 1, 2012)

- Permit a person with a disability to be accompanied by their support person while on organization's premises. Provide advance notice of fees charged for support person
- Consult with person with a disability and consider the health and safety implications based on available evidence prior to requiring the presence of a support person. If requiring presence of support person, waive fees for support person

Notice of Temporary Disruptions (Jan. 1, 2012)

- Provide notice of temporary disruptions to facilities or services used by persons with disabilities to access organization's goods, services or facilities
- Notification must include:
 - reason for the disruption;
 - anticipated length of disruption; and
 - alternative facilities/services available, if any

Training (Jan. 1, 2012)

- Ensure training on the provision of goods, services or facilities to persons with disabilities is provided to everyone who:
 - is an employee or volunteer
 - provides goods, services or facilities on organization's behalf;
 - participates in developing organization's policies
- **Prepare a document describing organization's training, and on request give a copy of document(s) to any person. Notify persons to whom the organization provides goods, services or facilities of the availability of same upon request. Maintain records of when and to whom training is provided.

Feedback (Jan. 1, 2012)

- Establish a process for receiving and responding to feedback about the manner in which organization provides goods, services or facilities to persons with disabilities
- Process must be accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports upon request
- Make feedback process available to the public

Information & Communications Standard

Feedback Process (L: Jan. 1, 2015; S: Jan. 1, 2016)

- Ensure existing feedback processes are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports upon request

Emergency procedure, plan, or public safety information (Jan. 1, 2012)

- Emergency or public safety information made available to the public must be provided in an accessible format or with communication supports upon request

****Website Accessibility (L: Jan. 1, 2014)**

- "New" internet websites and web content on those sites must conform with WCAG 2.0 Level A
- **All internet websites and web content must conform with WCAG 2.0 Level AA (subject to some content exceptions) (L: Jan. 1, 2021)

Employment Standard

Workplace emergency response information (Jan. 1, 2012)

Performance Management/Career Development/Re-Deployment (L: Jan. 1, 2016; S: Jan. 1, 2017)

- Take accessibility needs of employees with disabilities into account in the areas of (a) performance management; (b)

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- Provide individualized emergency response information to an employee who requires the information because of a disability

Recruitment/Assessment/Selection of Employees (L: Jan. 1, 2016; S: Jan. 1, 2017)

- Notify employees, the public, and job applicants about availability of accommodation during recruitment process
- Upon request, provide and arrange for accommodation in consultation with the person with a disability
- Inform successful applicants about policies for accommodating employees with disabilities

career development and advancement; and (c) re-deployment

Accommodation during employment (L: Jan. 1, 2016; S: Jan. 1, 2017)

- Advise all employees of policies used to support employees with disabilities
- Upon request make information (a) required to perform the job; and (b) generally available in the workplace accessible to an employee with a disability
- **Establish a written process for:
 - the development of documented individual accommodation plans for employees with disabilities
 - returning employees to work who have been absent due to a disability

Design of Public Spaces Standard

Construct or redevelop any public space in accordance with Part IV.1 of the Regulation **(L: Jan. 1, 2017; S: Jan. 1, 2018 with some applicable exemptions)**

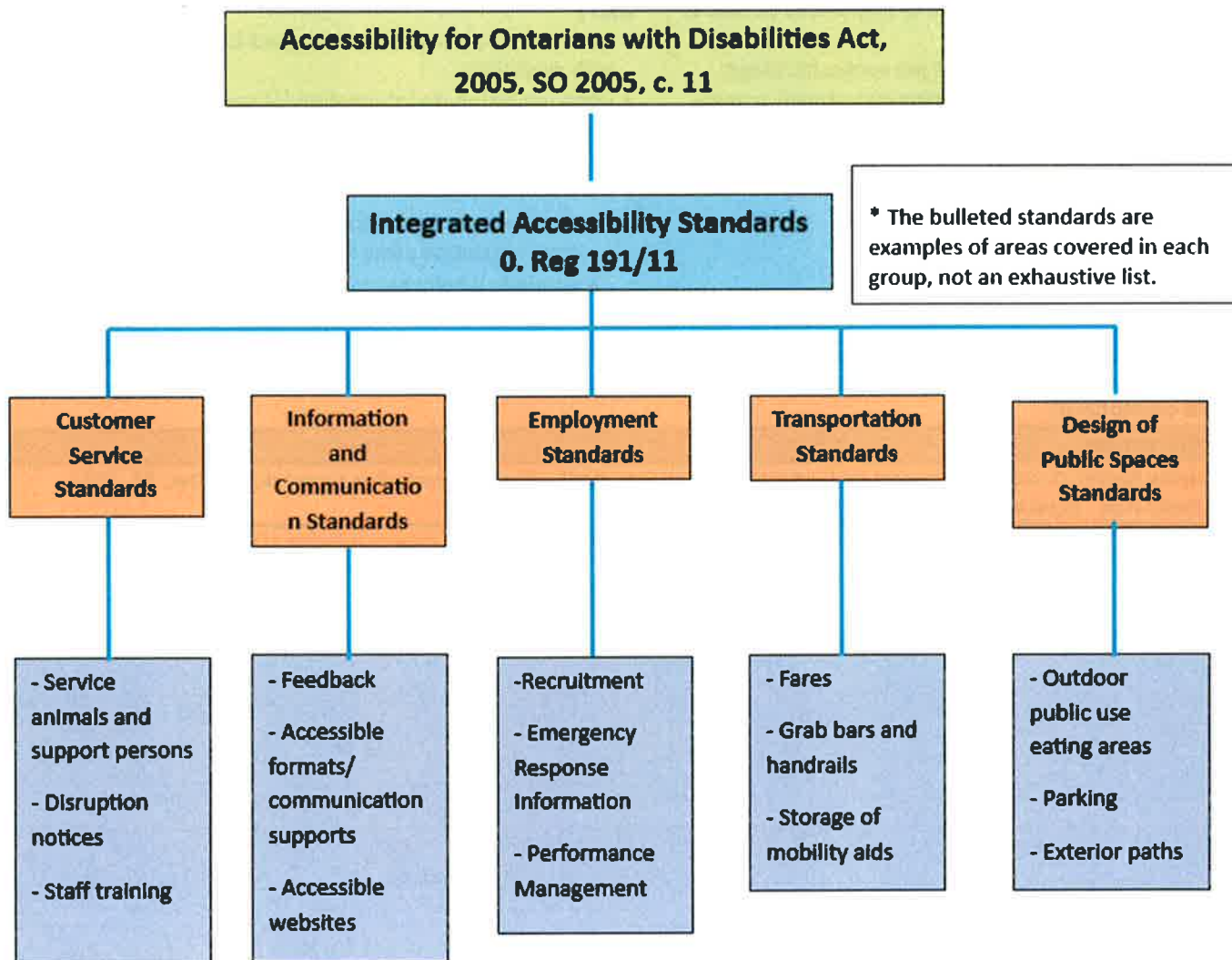
Ongoing Obligations

- Accessibility Report (Small – only report on Customer Service Standard) – Every 3 years after report due on Dec. 31, 2014.
- Accessibility Plan - Review and update at least once every 5 years.

**** **NOTE: This handout is provided for general information purposes only, is not a comprehensive summary of the AODA**

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AODA Flow Chart



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

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- 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 residence may also have rights under the Human Rights Code. These obligations under the Human Rights Code include:

- A retirement residence cannot refuse to let someone move into the residence simply because they have a disability, physical or mental, including depression.
- A retirement residence 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 residence.

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- 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.

Implementation

LDC 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

LDC 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

LDC 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.

IV. Accessibility at Our Premises

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

Assistive devices, services, or methods; alternate formats of documents; assistance of a staff member to complete a form; available screen readers; stool if counters are too high for a person of short stature; a chair for waiting in line if a person's disability prevents him/her from standing for lengthy periods; improved lighting in certain areas for individuals with vision disabilities.

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V. Service Animals and Guide Dogs

Persons with a disability may enter premises owned and/or operated by LDC 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 (Name of Residence) with a Support Person and have access to the Support Person while on the premises.

LDC 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.

LDC 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.

VII. Notice of Temporary Disruptions

LDC 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 residence page of the LDC 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

LDC will ensure the following individuals receive the training required under the Standards:

- i. Every employee and volunteer
- ii. Every person who participates in developing LDC policies.
- iii. Every other person who provides services or facilities on behalf of LDC.

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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.

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

LDC 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 LDC.
- ii. By telephone at 519-941-8433
- iii. In writing to 32 First Street, Orangeville, ON, L9W 2E1.
- iv. Electronically to dkholwell@lorddufferincentre.ca or on a USB.

B. Responding to Complaints

LDC 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:

Dave Holwell, Owner

Persons who wish to be contacted about their complaint must provide their contact information. The individual will then be contacted by a representative of LDC.

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

C. *Availability of Feedback Procedure*

LDC 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 LDC, by posting it on LDC's website, or by such other method as is reasonable in the circumstances.

Format of Documents

LDC 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.

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

Design of Public Spaces Standards

LDC will comply with the accessibility standards the Design of Public Spaces Standards (DOPS) when redeveloping or constructing new public spaces.

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>.

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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 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 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.

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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

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,

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the design of the eating area and the surface area. If you currently have an eating area and are not 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 residence 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 residence 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 residence 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.

Ensuing 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.

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

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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 residences 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 LDC policies, practices and procedures for accessible service please contact:

Dave Holwell, Owner - 519-941-8433 ext. 233

[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

Feedback Process Policy



Feedback Process

The ultimate goal of **LDC** is to meet and surpass customer expectations while serving all people, including those with disabilities. Comments regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way **LDC** provides goods, services and facilities to people with disabilities can be made by (insert the ways feedback can be provided, for example: using a feedback form, by mail, e-mail, suggestion box, feedback card or verbally etc.). All feedback should be directed to:

(Insert details below)

Contact Person:	<u>Dave Holwell, Owner</u>
Address:	<u>32 First Street, Orangeville, ON L9W 2E1</u>
Telephone:	<u>519-941-8433</u>
Email:	<u>dkholwell@lorddufferincentre.ca</u>

Customers can expect a response within **(10)** business days.

Accessible Customer Service Feedback Form



Thank you for visiting **LDC**. Your feedback is important to us. We consistently strive to improve accessibility for all our customers to meet their needs.

Please take a few moments to share your experience with us today.

1. Date of your visit: _____
2. Approximate time of your visit: _____
3. Departments visited: _____
4. Were you satisfied with our customer service today? YES NO
5. Did you have any problems with accessing our goods, services and/or facilities? YES NO
If YES, please explain: _____
6. What, in your opinion, can we do to resolve this problem? _____

7. May we contact you for additional information? YES NO
If YES, please state your address and telephone number: _____

In order for us to solve this problem efficiently and to help us better serve you and others in the future, please complete the following information.

Do you currently have a disability? YES NO

If YES, please explain: _____

Please circle your appropriate age range:

Less than 19 / 20 – 29 / 30 – 39 / 40 – 49 / 50 – 59 / 60 – 69 / over 70

I agree to allow LDC to use the information collected on this form.

Name

Signature

Date

(For Office Use)

Feedback Reference # _____



Feedback Response Form

Responding to Client/Customer Feedback

Feedback Reference #: _____

Date: _____

Your name: _____

Department/Office: _____

Date feedback received: _____

Name of client/customer (if known): _____

Contact information (if given): _____

Details: _____

Action to be taken: _____

Date to be completed: _____

Has client/customer been contacted? () YES () NO

If YES, state outcome: _____

Additional Comments: _____

Signature: _____

Date: _____

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[illegible]

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Accessible Documentation Policy

Here are a few helpful tips and resources for Accessible documentation:

For accessible **PowerPoint** presentations:

- High colour contrast between foreground and background
- The Canadian National Institute for the Blind (CNIB) recommends a minimum of a 16-pt. font, sans serif such as Arial or Helvetica
- Backgrounds should be plain, use pastel colours and avoid busy patterns
- Avoid cluttered screens (too many words, images or both) as they are confusing
- If uploading to a course site, save PowerPoint file as a **.pdf**



Word Documents

As Microsoft Word documents are mainly text, they are usually considered accessible. However, when design elements such as tables, columns, lists and images are incorporated into the document, they can render it inaccessible. To ensure your Word document is fully accessible it is recommended that style sheets be used when creating the document. Style sheets provide structure to the document using specific coding. When an individual using screen reader software accesses the document, this coding is read by the screen reader and communicated to the individual. Stylesheets can also be a time saver for the writer, particularly if you create your own templates.

Websites

An accessible web site is one that is easy to navigate, well organized and conveys information in a consistent, logical manner. Screen readers can read the text on the screen, but images, graphs and charts can be meaningless to those with vision problems.

Some website basics:

- use <alt> tags on images
- Don't use graphics to communicate information - use text
- Multimedia presentations such as videos require captioning or text transcripts
- Provide summaries of data tables
- Keep navigation simple and consistent
- Use contrasting text and background
- Don't initiate actions that can't be stopped
- Chunk text - use white space around text for easier reading
- Don't use "click here." It is better to describe the link

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Accessible Documentation Policy (continued)

Links:

<http://terrillthompson.com/blog/25>

<http://webaim.org/techniques/acrobat/>

<http://webaim.org/techniques/word/>

<http://webaim.org/>

<http://acrobatusers.com/topics/accessibility> (accessible Adobe products)

Notice of Service Disruption Policy



Notice of Service Disruption

LDC will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Notice may be given by posting the information at all public entrances and service counters on our premises.

Refer to **Dave Holwell** of **Lord Dufferin Centre** for further information in such cases.

Notice of Service Disruption Policy



NOTICE DISRUPTION IN SERVICE

There will be a scheduled service disruption at the	Lord Dufferin Retirement Residence 32 First Street Orangeville, ON L9W 2E1
The details of the service disruption are:	
Date:	
Type of Disruption:	
Reason for Disruption:	
Duration of Disruption:	
Alternative Facilities or Services Available:	

On behalf of LDC, we thank you for your understanding and patience in this matter as we continually strive to serve you better. We apologize for any inconvenience this may cause. Should you have any inquiries or concerns, please direct them to the contact person listed below. Thank You.

Customer Contact: Dave Holwell

Insert Name: Dave Holwell Title: Owner

Tel: 519-941-8433 Email: dkholwell@lorddufferincentre.ca

Service Animals Policy



Service Animals

LDC is committed to welcoming people with disabilities who are accompanied by a service animal in the areas of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

An animal is considered to be a service animal for a person with a disability if:

- a) the animal 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) 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.

Support Persons Policy



Support Persons

LDC is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter **LDC** premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

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 or medical needs or with access to goods, services or facilities.

LDC 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.

Fees will not be charged for support persons for admission to **LDC**’s premises. Customers will be informed of this by a notice that will be posted on **LDC**’s premises and on **LDC**’s website.

AODA Customer Service Standard – Training Log

Staff Training Record

Employee Name: _____

Date of Record Commencement: _____

Date of Training	Name of Training	Name of Trainer	Location of Training	Training Verification (e.g. Certificate of completion / attendance record)	Comments

{NAME OF RETIREMENT RESIDENCE}

SECTION: ADMINISTRATION

**MODULE 2: REGULATORY OPERATIONAL POLICIES AND
FORMS**

Instructions for Filing an Accessibility Report

Completing your accessibility compliance report

- Businesses and non-profits with 20 or more employees and public sector organizations must follow these steps to complete an accessibility compliance report.

<https://www.ontario.ca/page/completing-your-accessibility-compliance-report>