



LINWELL GARDENS

Accessibility for Ontarians with Disabilities Policy

I. Statement of Commitment to Accessibility

October 2023

Linwell Gardens is committed to providing a barrier-free environment for all stakeholders including our customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. We respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005). Specifically, we are committed to upholding requirements under the Customer Service Standard, the Integrated Accessibility Standards Regulation and any other regulations that will be required for our organization under the AODA.

To ensure we are meeting accessibility compliance Linwell Gardens has created a Multi-Year Plan which include steps such as incorporating policies, procedures, and training for employees. Below are specific commitments we are making to ensure we increase accessibility in our organization:

- Ensuring ongoing compliance with the Customer Service Standard.
- Ensuring that training is provided to all employees and persons who participate in developing our policies
- Ensuring that our employment practices including (but not limited to) recruitment, candidate evaluation, and selection provide accommodation as needed and that employees and applicants are aware that accommodation is available.
- Ensuring that our information and communications are available in alternate formats upon request.
- Ensuring that individual workplace accommodation plans are developed and implemented as required.

At Linwell Gardens we believe we have an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone.

MULTI-YEAR ACCESSIBILITY PLAN



ACCESSIBLE CUSTOMER SERVICE

Linwell Gardens is committed to providing a barrier-free environment for our customers. The objective of this policy is to ensure we meet the requirements of the Standard and promote its underlying core principles. *Please click here to view our Accessible Customer Service Policy.*

FEEDBACK PROCEDURE

Linwell Gardens welcomes and appreciates feedback regarding any of our accessibility policies and implementation. Customers can provide feedback verbally (in person or by telephone) or written (hand written, delivered, or email). Customers can submit feedback to:

Human Resources
Phone Number: (905) 563-6383
Mail: 5280 South Service Road, Beamsville, ON L0R 1B3
Email: hr@linwellgardens.com

When you provide a formal feedback, you will receive acknowledgement of your feedback, along with any resulting actions based on concerns or complaints that were submitted.

DOCUMENTATION TO BE MADE AVAILABLE

Linwell Gardens will provide upon request documents, or the information contained in documents, required to be provided under the Standard, to a person with a disability in a format that takes the person's disability into account.

We will strive to meet the needs of individuals with disabilities in a timely and effective manner.

EMPLOYMENT

Linwell Gardens Ltd is committed to providing barrier-free recruitment and selection processes and work environment. We are happy to discuss any need for accommodation and will make every effort to meet those needs in a timely manner. Please advise the Human Resources Department if you require accommodation throughout the recruitment and selection processes and/or within the work environment. Information received in relation to accommodation measures will be addressed confidentially.

For more detailed information on our accessibility documents, policies, and plans, please contact the Human Resources Department by phone: (905) 563-6383, or by email: hr@linwellgardens.com

II. Integrated Accessibility Standards Regulation (IASR) General Requirements

The AODA policies are intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Standards set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). The standards that apply to Linwell Gardens are:

- *Employment,
- * Design of public Spaces, and
- * Customer Services,
- * Information and communication.

It is very important that you read and understand each of these policies. If you require this document or any policies, in an alternate format, please let us know and we will work to find a mutually agreeable solution.

All services provided by Linwell Gardens Ltd shall follow the principles of dignity, independence, integration and equal opportunity.

A. General Requirements that apply across all the standards are:

Establishment of Accessibility Policies and Plans: Linwell Gardens Ltd will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Linwell Gardens Ltd is commitment to meeting the accessibility needs of persons with disabilities in a timely manner. These documents will be made publicly available in an accessible format, upon request.

Linwell Gardens Ltd will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on Linwell's website.

Linwell Gardens Ltd will review and update its accessibility plan once every five (5) years.

Procuring or Acquiring Goods and Services, or Facilities: Linwell Gardens Ltd will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements: Linwell Gardens Ltd will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Linwell Gardens Ltd's policies, and all other persons who provide goods, services or facilities on behalf of Linwell Gardens Ltd.

Training will be provided as soon as is reasonably practicable. Training will be provided on an ongoing basis to new employees and as changes to Linwell Gardens Ltd's accessibility policies occur.

Records: Linwell Gardens Ltd will maintain records on the training provided, when it was provided and the number of employees that were trained.

B. Review

This policy will be reviewed regularly to ensure that it is reflective of Linwell Gardens Ltd's current practices as well as legislative requirements

III. Integrated Accessibility Standards Regulation (IASR) Employment Policy

Intent

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the **Employment Standard** set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Linwell Gardens Ltd shall follow the principles of dignity, independence, integration and equal opportunity.

Definitions

Accessible Formats– Include large print, recorded audio and electronic formats, braille and more.

Communication Supports – Include captioning, alternative and augmentative communication supports, plain language, sign language and more.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment –reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the company

General Principles

A. Recruitment, Assessment and Selection

Linwell Gardens Ltd will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Linwell Gardens Ltd will consult with the applicant and provide or arrange for suitable accommodation. Successful applicants will be made aware of Linwell Gardens Ltd's policies and supports for accommodating people with disabilities.

B. Accessible Formats and Communication Supports for Employees

Linwell Gardens Ltd will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Linwell Gardens Ltd will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Linwell Gardens Ltd will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

C. Workplace Emergency Response Information

Where required, Linwell Gardens Ltd will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Linwell Gardens Ltd reviews general emergency response policies.

D. Documented Individual Accommodation Plans

Linwell Gardens Ltd will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities.

E. Performance Management and Career Development and Advancement

Linwell Gardens Ltd will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

F. Return to Work

Linwell Gardens Ltd will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Linwell Gardens Ltd will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

G. Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment. *Individual accommodation plans will be consulted, as required.*

H. Review

AODA – Company Policy



This policy will be reviewed regularly to ensure that it is reflective of Linwell Gardens Ltd's current practices as well as legislative requirements.

IV. Integrated Accessibility Standards Regulation (IASR) Customer Service Policy

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Customer Service Standards set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

Definitions

Assistive Device – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide Dog – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – an animal is a service animal for a person with a disability if:

1. 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
2. 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;
 - Chiropractors of Ontario;
 - Nurses of Ontario;
 - Psychologists,
 - Registered Psychotherapists & Mental Health Therapists, ON
 - Occupational Therapists of Ontario;
 - Optometrists of Ontario;
 - Physicians and Surgeons of Ontario;
 - Physiotherapists of Ontario;

Service Dog – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

Guidelines

A. The Provision of Goods and Services to Persons with Disabilities

Linwell Gardens Ltd will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

B. The Use of Assistive Devices

Customer's Own Assistive Device(s): Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Linwell Gardens Ltd.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Recognizing a Guide Dog, Service Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Linwell Gardens Ltd may request verification from the customer.

Care and Control of the Animal: The customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Linwell Gardens Ltd will make all reasonable efforts to meet the needs of all individuals.

D. The Use of Support Persons

If a customer with a disability is accompanied by a support person, Linwell Gardens Ltd will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Linwell Gardens Ltd. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Linwell Gardens Ltd's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible. When disruptions occur Linwell Gardens Ltd will provide notice by posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption.

F. Customer Feedback

Linwell Gardens Ltd will provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Customers can provide feedback verbally (in person or by telephone) or written (hand written, delivered, or email). Customers can submit feedback to:

Human Resources
Phone Number: (905) 563-6383
Mail: 5280 South Service Road, Beamsville, ON L0R 1B3
Email: hr@linwellgardens.com

Customers who wish to provide feedback by completing an onsite customer feedback form, can do so at the main office.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training

Regardless of the format, the employees' training will cover a review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*; the requirements of the *Customer Service Standards*; Instructions on how to interact and communicate with people with various types of disabilities; Instructions on what to do if a person with a disability is having difficulty accessing your services; Linwell Gardens Ltd's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

H. Notice of Availability and Format of Documents

Linwell Gardens Ltd shall notify customers that the documents related to the Customer Service Standards are available upon request and in a format, that considers the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Linwell Gardens Ltd, and/or in the company's website.

I. Administration

If you have any questions or concerns about this policy or its related procedures please contact: Human Resources, hr@linwellgardens.com

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.

AODA – Company Policy



LINWELL GARDENS

***Note: This policy is current to the July 1, 2016 changes to accessibility legislation. It has been revised as of October 11, 2023 in accordance with the December, 2023 audit. The policy may have to be revised as other standards are introduced under the Accessibility for Ontarians with Disabilities Act, 2005**

V. Integrated Accessibility Standards Regulation (IASR) Design of Public Spaces Policy

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the **Design of Public Spaces Standard** set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to removing barriers in two (2) areas: **Buildings and Public spaces**.

Definitions

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Redeveloped – A planned significant alteration to a public space. It does not include maintenance activities, environmental mitigation or environmental restoration.

General Principles

A. Off-Street Accessible Public Parking

Types of Spaces and Access Aisles: Linwell Gardens Ltd will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities: Type A – Parking space with a minimum width of 3.4 m; and Type B – Standard parking space with a minimum width of 2.4 mm.

Access aisles will be provided for all accessible parking spaces and will meet the requirements of the *Integrated Accessibility Standards*, [section 80.35](#).

Minimums: Linwell Gardens Ltd will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the *Integrated Accessibility Standards*, [section 80.36](#).

Signage: Linwell Gardens Ltd will ensure that the proper signage is provided for each accessible parking space. Type A parking spaces will have signage indicating van accessibility.

B. Obtaining Services

Service Counters: When constructing or replacing any service counters, Linwell Gardens Ltd will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, [section 80.41](#).

C. Maintenance

Linwell Gardens Ltd shall ensure that our multi-year accessibility plan addresses the Preventive and emergency maintenance procedures for the accessible elements in public spaces; and procedures for temporary disruptions to accessible elements.

D. Exceptions

There may be times where it is not possible for Linwell Gardens Ltd to meet all technical requirements as outlined within legislation. In these instances, Linwell Gardens Ltd will strive to meet the requirements to the fullest extent to allow for accessible use with particular constraints as addressed in legislation.

AODA – Company Policy



K. Review: This policy will be reviewed regularly to ensure that it is reflective of Linwell Gardens Ltd's current practices as well as legislative requirements.

VI. Integrated Accessibility Standards Regulation (IASR) Information & Communications Policy

Intent

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the **Information and Communications Standard** set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of information and communications services and materials for people with disabilities.

All information and communications materials and services provided by Linwell Gardens Ltd shall follow the principles of dignity, independence, integration and equal opportunity.

Definitions

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready– An electronic or digital format that facilitates conversion into an acceptable format.

General Principles

A. Feedback Process

Linwell Gardens Ltd will ensure that all feedback processes (both internal and external) are made accessible to clients/customers or employees.

In accordance with the customer service standards, Linwell Gardens Ltd will make known the availability of accessible feedback formats.

B. Accessible Formats and Communication Supports

Unless deemed *unconvertible*, Linwell Gardens Ltd will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual. Linwell Gardens Ltd will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability. Linwell Gardens Ltd will make the availability of accessible formats and communication supports publicly known.

C. Emergency Procedures, Plans or Public Safety Information

Linwell Gardens Ltd will ensure that all publicly available safety and emergency information (e.g. evacuation procedures, etc.) is provided in an accessible format or with appropriate communication supports, upon request.

D. Accessible Websites and Web Content

Linwell Gardens Ltd will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.

E. Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Linwell Gardens Ltd will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Linwell Gardens Ltd will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

F. Review

This policy will be reviewed regularly to ensure that it is reflective of Linwell Gardens Ltd's current practices and legislative requirements.