

# Integrated Accessibility Standards

## Responsible Parties:

- Executive Director
- Director of Operations
- Regional Dir. Of HR

## Policy Statement:

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 a person with a disability.

The Integrated Accessibility Standards (“IAS”) has been established under the Act to ensure accessibility for every person with a disability in the areas of (i) information and communication, (ii) employment, (iii) transportation, (iv) design of public space and (v) customer service.

Sunrise Senior Living (“Sunrise”) strives to provide an accessible environment for its team members and members of the public. Sunrise is committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with a disability in a timely manner.

The objective of this policy (the “Policy”) is to identify and document how Sunrise seeks to achieve compliance with the requirements of the IAS and how it will continue to work toward improving accessibility for persons with a disability.

Nothing in this Policy is intended to replace or negate existing laws related to accessibility for persons with disabilities including but not limited to the Human Rights Code and the Workplace Safety and Insurance Act, 1997.

## Scope:

This policy applies to Ontario, Canada

The Policy applies to:

- Every person who is an employee of, or a volunteer with, Sunrise.
- Every person who participates in developing Sunrise’s policies.
- Every other person who provides goods, services or facilities on behalf of Sunrise.

## Definitions:

- **Accessible Format** - May include, but is not limited to, large print, recorded audio and electronic format, braille and any other format usable by a person with a disability.
- **Communication Support** - May include, but is not limited to, captioning, alternative and an augmentative communication support, plain language, sign language and any other support that facilitates effective communication.
- **Disability** – means:

# Integrated Accessibility Standards

- (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.
- (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 an activity related to assessing and improving team member performance, productivity and effectiveness, with the goal of facilitating team member success.

**Redeployment** - means the reassignment of a team member to other department or job as an alternative to layoff, when a particular job or department has been eliminated.

**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 a website and web content accessible to people with a wide-range of disabilities. The IAS requires an organization to become compliant with two levels of the WCAG - Level A and Level AA.

# Integrated Accessibility Standards

## Action Steps:

### 1. GENERAL ACCESSIBILITY STANDARDS

#### (a) Communication

Sunrise strives to communicate with a person with a disability in a manner that takes into account the individual's disability.

#### (b) Accessibility Plan

Sunrise has established and implemented an Accessibility Plan to outline Sunrise's strategy to prevent and remove barriers for a person with a disability and meet the requirements of the IAS.

Sunrise will maintain the Accessibility Plan in accordance with the requirements of the IAS and will review and update it at least once every five (5) years.

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

#### (c) Training

Sunrise will provide initial training, and ongoing training as required under the IAS, to all persons to whom this Policy applies.

Training will be provided on:

- (i) The requirements of the IAS and the Policy.
- (ii) Sunrise's obligations under the Human Rights Code as they relate to a person with a disability.

Sunrise will ensure training is provided to all persons to whom this Policy applies as soon as practicable after the person is hired or otherwise retained. On-going training will also occur as changes are made to the Policy.

Sunrise will maintain records of the individuals to whom training is provided and when the training occurred.

### 2. INFORMATION AND COMMUNICATION STANDARDS

#### (a) Feedback Procedure

Sunrise will ensure its process for receiving and responding to feedback is accessible to a person with a disability by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

Sunrise will notify the public of the availability of Accessible Formats and Communication Supports for feedback purposes.

#### (b) Accessible Formats and Communication Supports

Upon request, Sunrise will provide or arrange for the provision of Accessible Formats and Communication Supports to make its communication or information about its goods, services and/or facilities accessible to a person with a disability. Accessible Formats and Communication Supports will be provided in a timely manner and at a cost no more than the regular cost charged to any other person.

## Integrated Accessibility Standards

Sunrise will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support. Sunrise will also notify the public of the availability of Accessible Formats and Communication Supports

### (c) Emergency Plans, Procedures and Public Safety Information

Sunrise will provide any emergency plans, procedures or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports upon request and as soon as practicable.

### (d) Accessible Websites and Web Content

Sunrise will ensure, where practicable, any New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

Sunrise will ensure, 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 are practicable Sunrise will consider the availability of commercial software or tools required to achieve web accessibility; and the impact meeting the requirements of this section will have on any project planned before January 1, 2012.

The commitment to provide an accessible website and web content only applies to a website and web content Sunrise controls directly or indirectly through a contractual relationship allowing for modification of the website or web content at issue.

## 3. EMPLOYMENT STANDARDS

The Employment Standards only apply to team members of Sunrise. They do not apply to volunteers or other unpaid individuals or contractors.

### (a) Recruitment, Selection and Assessment

Sunrise will notify the public and team members of the availability of accommodation during the recruitment process.

Sunrise will notify 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, Sunrise 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.

### (b) Notice to Successful Applicants

When making an offer of employment Sunrise will notify the successful applicant of Sunrise policy on accommodating team members with a disability.

### (c) Informing Team Members of Supports

Sunrise will inform its team members of its policies on supporting a team member with a disability, including, but not limited to, its policy on the provision of job accommodation that takes into account a team member's accessibility needs due to disability. This information will be provided to a new team member as soon as practicable after commencing employment.

## Integrated Accessibility Standards

Sunrise will provide team members with updated information whenever there is a material change to its policies on the provision of job accommodation for a team member with a disability.

### (d) Accessible Formats and Communication Supports for Team Members

Upon the request of a team member with a disability, Sunrise will provide or arrange for the provision of Accessible Formats and Communication Supports to ensure information required by the team member to perform his or her job and/or information generally available to a team member in the workplace is accessible to the team member with a disability.

Sunrise will consult with the team member making the request to determine the suitability of any Accessible Format or Communication Support. However, Sunrise reserves the right to determine the Accessible Format or Communication Support provided.

### (e) Workplace Emergency Response Information

Sunrise will provide individualized emergency response information to any team member who requires it as a result of a disability. This information will be provided as soon as practicable after Sunrise becomes aware of the team member's need for an individualized response.

Where the team member will require assistance in an emergency, and with the team member's consent, Sunrise will designate a colleague(s) to provide such individualized assistance and will provide the colleague(s) with the team member's individualized emergency response information.

Sunrise will review the individualized workplace emergency response information when (i) the team member moves to a different work location, (ii) the team member's overall accommodation needs or plans are reviewed, and/or (iii) Sunrise reviews its general emergency response policies.

### (f) Individual Accommodation and Return to Work

Sunrise has a written process for developing a documented individual accommodation plan for a team member with a disability. The process includes all elements required by the IAS.

Any individual accommodation plan prepared for a team member will include:

- I. Information on Accessible Formats or Communication Supports provided to the team member.
- II. Any individualized workplace emergency response plan developed for the team member.
- III. Any other forms of accommodation being provided to the team member as a result of his or her disability.

Sunrise also has a written process for any team member who may be returning to work following a disability-related leave of absence. The process includes the steps taken to facilitate the team member's return to work and the development of any required individual accommodation plan on return.

For more information, please consult Sunrise's Individual Accommodation and Return to Work Policy.

### (g) Performance Management, Career Development and Advancement and Redeployment

Sunrise will take a team member's accessibility needs, and any individualized accommodation plan, into account in:

- I. Conducting performance management.

## Integrated Accessibility Standards

- II. Providing opportunities for career development and advancement.
- III. Making redeployment decisions

### QUESTIONS ABOUT THIS POLICY

For more information about the Policy please contact:

[Sunrise@sunriseseniorliving.com](mailto:Sunrise@sunriseseniorliving.com) or 703-273-7500 (Request to speak with our legal department).

### Regulatory References:

Source	Section
Accessibility for Ontarians with Disabilities Act	

# Integrated Accessibility Standards

## Revision History:

Date	Rev. #	What Changed
12-30-23		Original document