



Willowgrove's Accessibility for Ontarians with Disabilities Act (AODA) Package

November 29, 2023



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Statement of Commitment – AODA (Accessibility)

Willowgrove is committed to treating all people with dignity, respect, and independence. Integral to our Mission, we believe in integration and equal opportunities for all.

Willowgrove is committed to supporting the goals of the Accessibility for Ontarians with Disabilities Act, 2005 ('AODA'). Willowgrove will establish policies, practices and procedures which are consistent with the accessibility standards established under the AODA, to identify, remove and prevent barriers to people with disabilities.

Willowgrove will ensure that both the regulations and principles of the AODA are adhered to for the following standards:

- Customer Service
- Information and Communications
- Employment
- Built Environment (when possible)
- Transportation (as applicable)

To facilitate this commitment, Willowgrove 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 Integrated Accessibility Standards Regulation. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

Should you require an alternative format of a this or another document, a copy of Willowgrove's AODA documentation, more information, or if you wish to provide feedback, please contact:

Willowgrove's Executive Director: Johnny Wideman
Phone: (905) 640-2127
Email: johnny@willowgrove.ca

This document can be made available in an alternate format upon request.



Accessibility Policy

POLICY STATEMENT

Willowgrove is committed to upholding and exceeding, where possible, Ontario's legislation intended to remove barriers to accessibility for persons with disabilities. This includes providing equal access to employment, information, goods, and services, and treating persons with disabilities with dignity and respect in a way that takes their disability into account.

DEFINITIONS

Definitions taken from the *Accessibility for Ontarians with Disabilities Act, S.O. 2005, C. 11* or *Ontario Human Rights Code*.

"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.

"Barrier" means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice; ("obstacle").

"Disability" is defined broadly by the *Ontario Human Rights Code* as:

1. "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 coordination, 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,
2. a condition of mental impairment or a developmental disability,
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. a mental disorder, or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*."

POLICY

Willowgrove will make every reasonable effort to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*, including all applicable elements of the *Integrated Accessibility Standards*.

1. Information and Communication



2. Employment
3. Customer Service
4. Design of Public Spaces
5. Transportation

Willowgrove will provide training to all employees, volunteers, and independent contractors to ensure they are familiar with our policies, practices, and procedures for communicating with and providing services to persons with disabilities.

Information and Communication

Willowgrove will make its information accessible to people with disabilities by creating materials and supports in accessible formats, and it will notify the public of the types of accessible formats provided.

Further, Willowgrove will deliver alternate formats of information to clients, upon request. If a particular material cannot be converted into an accessible format that meets the needs of the person requesting it, Willowgrove will provide details of why it cannot be converted and provide a summary of the information or communication in another way that is suitable to the person requesting it.

This extends to any emergency procedures or safety information prepared by Willowgrove.

Employment

Willowgrove welcomes and encourages employment applications from people with disabilities and will do its part to make hiring and employee support practices more accessible by providing accommodation during all stages of recruitment, hiring, and employment.

On Willowgrove's website, the "Work With Us" page (www.willowgrove.ca/work-with-us) includes the following text with a link for support:

Diversity/Support Throughout the Hiring Process: For all of Willowgrove's positions, the organization encourages all qualified people to apply, while also recognizing that there are unique barriers for individuals from marginalized or underrepresented populations. If this is true for you, please let us know how Willowgrove can better accommodate you throughout the recruitment process.

If a job applicant requests accommodation, Willowgrove will consult with the applicant and provide suitable accommodation that takes the person's accessibility needs into account. Then, when making offers of employment, Willowgrove will notify the successful applicant of its policies for accommodating employees with disabilities.

New employees will be provided this manual upon being hired in order to be informed and/or reminded about the organization's job accommodation policies as soon as possible, and will be notified when any future changes are made to these policies. Policy and practice information will include available employment accommodations that will be provided for job related matters such as performance management, career development, emergency response plans, and return to work information.



Willowgrove will consult with an employee who requests it, to provide or arrange for the provision of accessible formats and communication supports that take the employee's needs into account when providing information that is needed to perform the employee's job, and information that is generally available to employees in the workplace.

Customer Service

Willowgrove will provide customer service in a manner that removes barriers for people with disabilities according to the following key principles of the AODA:

- Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities.
- Service to people with disabilities will be integrated with others, unless an alternate way of providing the goods, service or facility is required by the person with the disability.
- Persons with disabilities will be given equal opportunity to use and benefit from the goods, services, or facilities an organization or business has to offer.
- We will communicate with people with disabilities in a way that takes the individual's disability into account.

Assistive Devices, and Service Animals, Service Dogs or Guide Dogs

Persons with disabilities who use an assistive device will be permitted to use their own device to access the goods and services of Willowgrove.

If a person with a disability is accompanied by a guide dog or other service animal, Willowgrove shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with them, unless the animal is otherwise excluded by law from the premises.

Support Workers

If a person with a disability is accompanied by a support person, Willowgrove will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

Willowgrove will endeavor to allow free admission to any support workers accommodating individuals with disabilities. However, if – for any reason - admission fees will be charged to support workers for accessing goods or services in their role as a support person, Willowgrove will ensure that notice is given in advance, including how much the fee will be.

Service Interruptions

If there is a temporary disruption in any of our services either in whole or in part, Willowgrove will provide notice of the disruption to the public via as many channels as possible, in accessible formats, where available. We will physically post notices at the laneway, or the building or program area where the disruption is taking place, if applicable, as well as through any other channels that are appropriate such as email, answering machine, social media, and/or the website.



Notice of the disruption will include the reason for the disruption, its anticipated duration – if known - and a description of reimbursements or alternative services, if any, that are available.

Process for Receiving Feedback

Willowgrove will accept feedback about the way in which it provides goods and services to persons with disabilities in person, by phone or email, or in another way that is suitable to a person with a disability.

When a complaint is received about the way we provide goods, services, or facilities to persons with disabilities, Willowgrove will let the person who submitted the feedback know about the actions the organization will take to resolve the issue.

At Willowgrove, the person designated to accept feedback is: Johnny Wideman, Executive Director, phone (905) 640-2127 and email johnny@willowgrove.ca

Note: See “Schedule D: “Customer Feedback Form” at the end of this manual to see how customers can communicate their feedback regarding Willowgrove’s ongoing accessibility commitments.

Transportation

Willowgrove does not provide conventional or specialized commercial transportation services to passengers and is not required to adhere to the Transportation Standard.

However, once on site, Willowgrove can support the mobility and transportation needs of individuals within its programs through personal escorts utilizing vehicles such as golf carts, gator, RTV, and wagon (if available).

Design of Public Spaces

If Willowgrove redesigns or redevelops an outdoor public space such as a parking area, outdoor eating area or play space, exterior path of travel, recreational trail, waterfront access, or an indoor or outdoor service counter, waiting area or queuing line, it will do so in accordance with the Design of Public Spaces Standard of the AODA. Willowgrove will also ensure any newly redesigned or redeveloped areas are maintained in accordance with the rules set out by the AODA.

Accessible Customer Service Policy

POLICY STATEMENT

This policy is designed to meet the standards and act in accordance with Regulation 191/11, Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005. These standards were developed to identify, remove and prevent barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. The mandate of the Standard is that all obligated organizations must take measures to provide accessible service to all customers, including customers with all types of disabilities.



PURPOSE

Willowgrove is committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities. Willowgrove is also committed to ensuring our employees are educated and adhere to this policy. Willowgrove will make all reasonable efforts to ensure that all people are treated and provided customer service in a manner that is consistent with the principles of the AODA: Dignity, Independence, Equal Opportunity, and Integration.

POLICY

Customer Service and Communication

Willowgrove will ensure that effective customer service and communication is provided to all persons with a disability by adhering to the following:

- Make all reasonable efforts to ensure that the provision of goods and services to persons with disabilities will be integrated into regular practice.
- Offer and provide alternative measures and/or formats if necessary when requested by an individual with a disability.
- Ensure that, to the extent possible, accessible goods and services are delivered in a timely manner.
- All communication shall be provided in a manner that respects the dignity and independence of persons with disabilities.

Assistive Devices

Persons with disabilities may require the use of their own assistive devices to access services or goods. An assistive device is any device that is used, designed, made or adapted to assist people in performing a particular task. Willowgrove will take all reasonable measures to ensure goods and services are accessible to persons using assistive devices, including training employees in how best to support a customer using an assistive device.

In the case that the use of an assistive device poses a further challenge to the accessibility of goods and services, or raises a potential safety concern, all reasonable efforts will be made to accommodate the individual, which may include using an alternative assistive device, or providing the same, or modified service in a different manner.

Service Animals

Willowgrove is committed to welcoming persons with disabilities who are accompanied by a service animal. We will ensure that all staff who deal with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

The following terms apply to a person with a disability who is accompanied by a service animal:

- In the event a particular service animal is not allowed by law on or in a particular area of the premises, all reasonable efforts will be made to accommodate the individual, which may include an alternative form of assistance or providing the same service in a different manner.



- In the event of a valid health and safety issue, all reasonable efforts will be made to accommodate the individual, which may include an alternative form of assistance or providing the same service in a different manner.
- In the case of service dogs, the law allows them to accompany their owner to go where food is served, sold or offered for sale. The law also states service dogs are not allowed in places where food is manufactured, prepared, processed or handled.
- The owner is responsible for maintaining control of the animal at all times.

Support Persons

Willowgrove is committed to welcoming persons with disabilities who are accompanied by a support person.

The following terms apply to a person with a disability who is accompanied by support person:

- Willowgrove may require a person with a disability to be accompanied by a support person while on the premises in situations where it is necessary due to health and safety concerns.
- If necessary, the support person will help to modify programming, or provide an alternative, based on the individual's unique abilities and needs.
- Consent from the person/legal guardian of a person with a disability is required when communicating confidential issues related to the person with a disability, in the presence of a support person.
- If a fee is charged for the admission of a support person, the fee will be communicated and posted.

Notice of Temporary Disruptions

Willowgrove will publicly notify customers of temporary disruptions of services or facilities. If the disruption is planned the organization will publicly notify customers of the upcoming service disruption in advance of the start of the service disruption. A notice of temporary disruption will include:

- When the disruption will happen, if planned;
- Steps for accessing alternative methods;
- A description of alternative facilities or services, if they are available;
- The reason for the disruption; and
- How long the disruption will last.

The notice may be delivered to the public by the following methods:

- Posting at the main entrances and the source of the disruption;
- Via email notification to regular customers or customers with scheduled appointments;
- On social media, and/or the company's website.

Feedback Process

A feedback process regarding the provision of goods and services to persons with disabilities has been established. The manner in which feedback may be provided will be in such a way that best suits the person with a disability.



Willowgrove will review all feedback received and respond in a timely manner. If the feedback is of an urgent concern, a response to the person submitting the complaint will be issued as soon as reasonably possible.

Note: See *Schedule D: "Customer Feedback Form"* at the end of this manual to see how customers can communicate their feedback regarding Willowgrove's ongoing accessibility commitments.

Feedback will be provided to:

Willowgrove's Executive Director: Johnny Wideman
Phone: (905) 640-2127
Email: johnny@willowgrove.ca

Training

Willowgrove will ensure that all employees and applicable third parties who interact with customers are provided with accessibility training. Training will also be required for those individuals who are involved in the development or implementation of customer service policies, practices, and procedures.

The training will address:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- The requirements of the Accessibility Standards for Customer Service;
- Information about Company policies and procedures (including this policy);
- Best practice on how to communicate with persons with various types of disabilities;
- Best practice on how to interact with people with disabilities who use assistive devices, require the assistance of a service animal or a support person.

Willowgrove will retain a record of all individuals who have completed the required training.

Notice of Availability of Documents and Alternative Formats

Willowgrove will post notice of the availability of this policy, other documents prescribed by the Standard and the availability of alternative formats upon request. This information will be provided in our Statement of Commitment, which is posted at a conspicuous location for customers, as well on the company's website.



Information and Communications Standard Policy

POLICY STATEMENT

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 communication services and materials for people with disabilities.

PURPOSE

Willowgrove is committed to creating, providing, and receiving information in a way that is accessible to people with disabilities. When requested by a person with a disability Willowgrove will work with the individual to provide an accessible form of communication that takes into account the specific needs of that individual. Willowgrove is also committed to ensuring our employees are educated and trained to adhere to this policy. Willowgrove will make all reasonable efforts to ensure that all people are treated and provided information and communication in a manner that is consistent with the principles of the AODA: Dignity, Independence, Equal Opportunity and Integration.

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

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- D. Emergency Procedures, Plans or Public Safety Information
- E. Education and Training Resources
- F. Public Libraries
- G. Feedback
- H. Exceptions

A. General Requirements

General requirements apply to the Information and Communications, Employment and Transportation standards and are outlined as follows.



Establishment of Accessibility Policies and Plans

Willowgrove will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. Willowgrove will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

Willowgrove 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 our website.

Willowgrove will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement the accessibility plan. This status report will be posted on our website and shall be created in an accessible format upon request.

Procuring or Acquiring Goods and Services, or Facilities

Willowgrove 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

Willowgrove 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 Willowgrove policies, and all other persons who provide goods, services or facilities on behalf of the organization.

Training will be provided to all employees as soon as possible, but no later than required. Training will be provided on an ongoing basis to new employees and as changes to our accessibility policies occur. We will maintain records of who completed the training, including the date of completion.

B. Accessible Formats and Communication Supports

Willowgrove 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. Willowgrove 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.

C. Accessible Websites and Web Content

Willowgrove will ensure that our website and all web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, in accordance with the schedule set out in the regulation. This applies to web content on both the internet and the organization's intranet.



D. Emergency Procedures, Plans or Public Safety Information

Willowgrove will address accessibility in our emergency procedures. Willowgrove will prepare emergency procedures, plans or public safety information, which is available to the public and will be provided in an accessible format upon request.

E. Education and Training Resources

Every organization that is an educational or training institution shall do the following, if notification of need is given:

- Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by,
 - procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or
 - arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format.
- Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

F. Feedback Process

Willowgrove will ensure processes are in place for receiving and responding to feedback. Willowgrove will make these processes accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. Willowgrove will notify the public about the availability of these accessible formats.

G. 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.

Information is regarded as unconvertible where it is not technically feasible to convert, or the technology required to make the conversion is not readily available. In a case where it is determined information is unconvertible Willowgrove will ensure that the individual who made the request is provided with an explanation and a summary of the information.



Employment Standard Policy

POLICY STATEMENT

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 communication services and materials for people with disabilities.

PURPOSE

Willowgrove is committed to integrating accessibility into regular workplace processes and to ensure accessibility in the recruitment and selection process and throughout all stages of the employment life cycle. Willowgrove is also committed to ensuring our employees are educated on and adhere to this policy. Willowgrove will make all reasonable efforts to ensure that all people are treated and provided information and communication in a manner that is consistent with the principles of the AODA: Dignity, Independence, Equal Opportunity, and Integration.

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.

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

Redeployment – the 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 organization.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements
- B. Employment Standards Overview
- C. Recruitment, Assessment, and Selection
- D. Accessible Formats and Communication Supports for Employees
- E. Documented Individual Accommodation Plans
- F. Workplace Emergency Response Information
- G. Plans and Processes
- H. Return to Work and Redeployment



A. General Requirements

Establishment of Accessibility Policies and Plans will develop policies governing how it will achieve accessibility through these requirements. Willowgrove will post a statement of commitment outlining how it will meet the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will also be available to our employees and the public in an accessible format, upon request.

Willowgrove will develop, maintain and implement a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Willowgrove will post its accessibility plans on its website and provide the plan in an accessible format upon request. This plan will be reviewed and updated once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee if applicable.

Annual status reports will be prepared to report on the progress of steps taken to implement the accessibility plan and updates will be posted on its website. The plan or reports will be made available in an accessible format upon request.

Informing Employees of Supports

Willowgrove shall inform employees of its policies used to support its 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 a disability:

- Provide the information required to new employees as soon as practicable after they begin their employment.
- Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Procuring or Acquiring Goods and Services, or Facilities

Willowgrove 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

Willowgrove 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 Willowgrove policies, and all other persons who provide goods, services or facilities on behalf of the organization.

Training will be provided to all employees as soon as possible, but no later than required. Training will be provided on an ongoing basis to new employees and as changes to our accessibility policies occur. We will maintain records of who completed the training, including the date of completion.

B. Employment Standards Overview

The Employment Standards regulation will expand Ontario's labour pool by ensuring people with disabilities are welcomed and supported within all workplaces. Employment standards will assist organizations with employment recruitment, providing accessible information, plans for emergencies, individual accommodation, return to work, performance management, and career development and redeployment.



C. Recruitment, Assessment, and Selection

Willowgrove will make every reasonable effort to accommodate job applicants who have disabilities. Willowgrove shall notify employees and the public about the availability of accommodations for job applicants with disabilities. If a selected applicant requests an accommodation, Willowgrove shall consult with the applicant and provide and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability. Successful applicants will be made aware of the policies for accommodating employees with disabilities.

D. Accessible Formats and Communication Supports for Employees

Upon request, Willowgrove will make every reasonable effort to provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform a job or position; and
- Information that is generally available to all employees in the workplace.

E. Documented Individual Accommodation Plans

Willowgrove will develop and implement where required written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans will include the following:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways an employee can request an evaluation by an outside medical expert, or other experts to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

F. Workplace Emergency Response Information

Willowgrove 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.

- Willowgrove shall provide individualized workplace emergency response information to employees who have a disability;
- If the disability is such that the individualized information is necessary and the Willowgrove is aware of the need for accommodation due to the employee's disability;
- If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;



- Review the information when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when the Willowgrove reviews its general emergency response policies.

G. Plans and Processes

This area speaks specifically to employee performance management, career assessment, development and advancement.

Willowgrove will ensure that all plans and processes will account for and respect the accessibility needs of their employees with disabilities when developing and implementing these plans and processes. The plan or process should be developed and implemented with consideration for each employee's (who has a disability) unique needs and capabilities.

H. Return to Work and Redeployment

Willowgrove will develop and implement (where required) return to work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work. The return to work process will be documented and include an outline of the steps necessary to facilitate the employee's return to work. The return to work process and plan will be created in consultation with the employee and shall use documented individual accommodation plans.

In the event of a redeployment, Willowgrove will take into account the accessibility needs of its employees.

Accessibility Addition for an Emergency Response Plan

The Accessibility for Ontarians with Disabilities Act (AODA) mandates that organizations in Ontario must provide and make available in an accessible format or with appropriate communication supports, information about emergency response plans or public safety to customers and employees with disabilities.

Willowgrove is committed to ensuring that all people have access to information and communication. Willowgrove will provide our Emergency Response Plan in a format that takes into consideration individual needs. Should you require:

- An alternative format of this document or any other document or appendix associated with our Emergency Response Plan;
- Clarification of the content or instructions regarding the Emergency Response Plan; or if you have a question, please contact:

Willowgrove's Executive Director: Johnny Wideman
Phone: (905) 640-2127
Email: johnny@willowgrove.ca

In addition, as per the requirement set out by the AODA, Willowgrove 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.



Note: See Schedule A: “Individualized Employee Emergency Response Information Form” at the end of this manual to see how the information for the emergency response worksheet is to be collected.

Note: See Schedule B: “Worksheet for Individual Emergency Response Plans” at the end of this manual to see how threats to the employee’s safety in an emergency situation may be identified, and how these threats may be overcome.

Should you require individual workplace emergency response information please contact:

Willowgrove’s Executive Director: Johnny Wideman

Phone: (905) 640-2127

Email: johnny@willowgrove.ca



Availability of Supports for Employees with a Disability (Notice)

Willowgrove is committed to integrating accessibility into regular workplace processes and to ensuring accessibility in the recruitment and selection process and throughout all stages of the employment life cycle.

Willowgrove is also committed to ensuring our employees are educated on and adhere to our AODA policies. Willowgrove will make all reasonable efforts to ensure that all people are treated and provided information and communication in a manner that is consistent with the principles of the AODA: Dignity, Independence, Equal Opportunity, and Integration.

Support for Individual with a Disability

Willowgrove is committed to ensuring that all employees are aware of those policies used to support employees with disabilities, including policies on the provision of job accommodation that take into account an employee's accessibility needs, as well as the development of individualized emergency response plans when required.

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, Willowgrove's AODA Employment Standard Policy addresses the following:

- A. General Requirements
- B. Employment Standards Overview
- C. Recruitment, Assessment and Selection
- D. Accessible Formats and Communication Supports for Employees
- E. Documented Individual Accommodation Plans
- F. Workplace Emergency Response Information
- G. Plans and Processes
- H. Return to Work and Redeployment

Willowgrove will provide updated information to our employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

Note: *to facilitate certain supports or processes, the employer must be aware of the need for accommodation due to the employee's disability.*

Should you have a question or require support, as per the terms of the applicable AODA policy, please do not hesitate to contact Johnny Wideman, Executive Director by phone at (905) 640-2127 or by email at johnny@willowgrove.ca.

All inquiries are received in confidence, to the extent that it is operationally possible so to allow for the facilitation of the process or support.



Workplace Accommodation Policy and Process

POLICY STATEMENT

Willowgrove is committed to providing an accessible working environment for all employees. Willowgrove will support and facilitate the accommodation of employees with disabilities so that they are able to safely access all the opportunities that Willowgrove offers, subject only to the limits of undue hardship.

Willowgrove recognizes the importance of inclusion by design and barrier removal in the integration of employees with disabilities. Willowgrove will work to eliminate or minimize the adverse effects of all forms of barriers in accordance with its obligations under the Human Rights Code (“the Code”), and the Accessibility for Ontarians with Disabilities Act, 2005 (“the AODA”).

PURPOSE

Subject to the foregoing, the purpose of this policy is to guide process and decision-making for individual employee disability-related accommodations at Willowgrove. Moreover, this policy outlines the process for which accommodation requests will be received, approved and facilitated.

This document is available in alternate accessible formats on request.

DEFINITIONS

Disability: is defined by the *Human Rights Code* as follows:

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

Reasonable Accommodation: for the purpose of this procedure, is an individualized process which, to the point of undue hardship, involves the removal or alleviation of barriers that prevent an otherwise capable individual from participating equally in the workplace because of a disability. For the purpose of this document, “reasonable accommodation” and “accommodation” are used interchangeably.

Undue Hardship: The point at which, having regard to all of the relevant circumstances, providing an employee with accommodation is outweighed by financial and/or institutional costs, the impact on



other employees, health and safety considerations, and/or other relevant factors involved in providing the accommodation.

Objectives

Willowgrove is committed to:

- Ensuring compliance with all applicable legislation and Willowgrove policies;
- Ensuring that all requests for accommodation are considered on a case-by-case basis in order to determine accommodation requirements;
- Ensuring that all safety measures are taken into consideration when determining appropriate accommodation;
- Establishing an efficient and timely accommodation process that is consistent with the requisite principles outlined in Human Rights jurisprudence; and
- Outlining the process for submitting a request for accommodation, verifying and accepting the need for accommodation, and facilitating the accommodation.

General Principles

In individual cases, accommodation is a process which seeks to find the means to ameliorate (or reduce) those restrictions/limitations caused by the individual's disability that preclude the individual from either meeting the requisite qualifications or from carrying out the essential requirements of a position. This process will take into account the following guiding principles:

- The search for accommodation in any individual case is a process that takes into account the unique needs of the individual being accommodated.
- In the accommodation process, workplace parties will be expected to work together cooperatively in a respectful manner, to share information, and to avail themselves of potential accommodation solutions.
- Pursuant to the previous point, the individual must cooperate in the process by providing information, including medical reports, that clearly outline the restrictions/limitations/needs that result from the disability. As well, the individual must work with Willowgrove to find an appropriate accommodation.

Every effort should be made to provide reasonable accommodations. The accommodation selected will be an accommodation that aims to reduce the impact of the disability at work, most respects the individual's dignity, and does not give rise to undue hardship.

The accommodation process will incorporate measures to respect and protect the confidentiality of employee personal or medical information.



A written Accommodation Plan shall be developed to detail the roles and responsibilities of the parties and to facilitate accountability and regular monitoring. Accommodations shall be developed on an individualized basis, shall aim to remove barriers and ensure equality, and shall incorporate all appropriate measures to ensure the safety of the individual requesting the accommodation and all others. It is the obligation and desire of Willowgrove to provide appropriate accommodation up to the point of undue hardship, which includes health and safety considerations.

Confidentiality of Information

Requests for accommodation may involve the disclosure of private or highly sensitive information. Persons requesting accommodation shall be asked only for information required to support the accommodation request, and to respond appropriately to the request.

Information related to an individual's disability and accommodation requests shall be kept in a separate location from the individual's regular personnel file. Personal information concerning an employee's disability shall not be disclosed without the prior written consent of the individual or, where the disclosure is necessary to obtain an effective accommodation, without advising the individual to whom the information will be disclosed and must be managed in a manner that is consistent with the Personal Information Protection and Electronic Documents Act.

Only relevant stakeholders will be involved in the development of an employee's accommodation plan. Where the accommodation process requires the disclosure of confidential information to a third party (such as an external resource group), the third party and any person or department delegated by that third party shall be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and is used solely for the purpose for which the disclosure was required.

Accommodation Process

Workplace accommodations can range from simple and straightforward cases, to lengthy and complex ones. The steps in this procedure outline the general process by which Willowgrove addresses accommodation for employees with disabilities in the workplace. It must be recognized that the Human Rights Tribunal of Ontario has emphasized that following a proper process in every case is of critical importance and that failure to do so may be seen as a violation of the *Human Rights Code*.

The principles of dignity, individualization, inclusion, and full participation are to be applied throughout the entire accommodation process. All parties share in the responsibility to engage in meaningful dialogue and to work together respectfully towards accommodation solutions.

Requests for Accommodation

A need for accommodation for reasons of disability may be identified in a number of ways, including the following:

- An employee may identify the need by notifying their manager that due to a disability, they cannot perform the essential duties of their job and are requesting an individual accommodation plan.



- For an employee returning to work after an illness or injury, the return to work process involves a review to determine whether there are any disabilities and/or required accommodations prior to the employee returning to the workplace, and they are covered by the RTW Policy.
- The need for accommodation may be identified by a manager, health care provider or another party, in which case the employee will be made aware of the accommodation process.

Accommodation requests are to be made in writing to the employee's manager. If requested, the employee may provide their accommodation request in an alternate format that takes into account their accommodation needs.

In the event that an accommodation request is denied, the employee will be provided with written documentation of the reasons for the denial. These reasons will also be provided in alternate format upon request.

The denial of an accommodation request may be appealed, in writing, to Senior Management if not involved in the original decision or designate. A final decision will be reached as soon as reasonably possible, based on a review of the accommodation request, the written documentation of the reasons for the denial, and any further information provided by or obtained from all parties regarding the request.

Medical Documentation

A request for accommodation must be supported by appropriate medical documentation. Medical documentation must confirm that the employee has a disability that interferes in their ability to do their job or otherwise participate fully in the workplace, outline the specific restrictions and limitations that need to be accommodated, and the duration of the accommodation.

Pursuant to the previous point, the employee will be provided with a Functional Abilities Form, (FAF) which the employee will be instructed to have completed by their treating health care practitioner.

It is recognized that there may be some obvious cases where medical documentation would not be required; the Executive Director can assist with this determination.

Additional medical documentation may be required with complex medical cases, cases involving a permanent disability, or cases requiring clarification about the employee's disability or restrictions. In such situations, Willowgrove will provide the employee with the employer's written request for further information from the employee's doctor, medical specialist, or other healthcare provider.

Where such requests result in insufficient information to determine appropriate accommodation measures, Willowgrove may require the employee to undergo an independent medical examination. The employee will be requested to sign a consent document to permit enquiries and release of information to Willowgrove. The costs associated with obtaining additional medical documentation will be covered by Willowgrove.



Willowgrove will review the information in the medical documents received, and will only communicate non-confidential information (e.g. functional abilities, limitations or restrictions, prognosis, anticipated duration of accommodation) to the employee's manager.

No confidential information (e.g. diagnosis, treatment plan, name/specialty of the health care provider) will be shared without the prior written consent of the employee, excepting only where the information needs to be shared with a supervisor or others in order to achieve the accommodation.

Accommodation Process

The employee shall notify their manager of the request for an individual accommodation plan. The employee or manager may contact the Executive Director for assistance in the development of the accommodation plan. The Executive Director will provide information, support and assistance as needed throughout the accommodation process.

Once the request is received, the employee will be required to provide appropriate medical documentation, as noted above.

The medical documentation will be reviewed to ensure that the information provided is adequate and will request additional medical information if needed. The manager will be informed about the employee's restrictions, limitations, and accommodation needs.

The manager, in consultation with the employee, will make every reasonable effort to identify appropriate accommodation measures that will enable the employee to fulfill the essential duties of their job.

Note: *Willowgrove is not required to create a new position for the employee; the accommodation process is intended to assist the employee in performing their current position. However, in some cases, the employee may be assigned a temporary position pending resolution of their disability to the point where they are able to return to their position, with or without accommodation.*

The manager will also determine whether the employee requires individualized workplace emergency response information and/or an individual Workplace Emergency Response Information plan as a result of the disability.

All possible reasonable accommodation measures must be canvassed. Those accommodation measures selected to be included in the accommodation plan must be the measures that most respect the dignity of the individual while achieving the aim of providing the individual with equal opportunity, provided that no accommodation measures are selected which create undue hardship. Where a concern arises where either no measure for accommodation is available, or all possible accommodation measures would give rise to an undue hardship, the Executive Director and/or HR Committee, must be involved in any subsequent decisions regarding the accommodation process.

Once the accommodation measures have been determined, the manager will prepare a written accommodation plan outlining the nature of the accommodation and the measures agreed upon. The manager will sign the plan document, and the employee will be given an opportunity to sign the plan. A



copy of the final plan will be forwarded to all parties involved. A copy will be kept alongside the employee's personnel file.

Monitoring and Review

The employee's manager, with cooperation from the employee, is responsible for ensuring that the measures outlined in the accommodation plan are implemented. The manager must conduct ongoing monitoring and reassessment of the accommodation plan during the period of accommodation.

Willowgrove may request updated medical information on a periodic basis to support ongoing accommodations. If the accommodation is no longer appropriate, the employee and the manager will work together to gather relevant information and reassess the employee's needs in order for the employer to find the best accommodation measure.

The employee or manager can contact Willowgrove senior management to assist in reviewing or revising the accommodation plan if the restrictions and limitations have changed or if updated medical documentation is received.

Note: See Schedule C: "Individual Accommodation Plan" form at the end of this manual for how to review the employee's limitations and the job tasks that might be effected by these limitations, and what accommodations can be made as a result.

Return to Work Process – Non-Work Related Disability

At Willowgrove, we are committed to supporting employees who have been absent from work due to a non-work-related disability and who require an accommodation in order to return to work. Therefore, the following return to work (RTW) process has been put into place to facilitate an employee's safe and timely return to work.

STEP 1: INITIATE THE RETURN-TO-WORK PROCESS

The employee reports their need for a disability leave to their supervisor. Information is then sent to the Executive Director and HR Committee to act as Return to Work (RTW) Designate.

STEP 2: MAKE AND MAINTAIN CONTACT WITH THE EMPLOYEE ON LEAVE

RTW designate must maintain regular contact with the employee, with the employee's consent, in order to provide the employee with all necessary RTW information, to help resolve any problems with



treatment, if asked to by the employee, and to monitor the employee's progress until they are fit for work.

Employee must receive and follow the appropriate medical treatment. They must update the RTW designate about their progress, providing the healthcare provider the RTW information.

Manager must ensure that work practices are safe for returning employee, and assist the RTW designate with identifying accommodations, and analyzing the demands of each job task.

Healthcare provider provide appropriate and effective treatment to the employee, and provide required information on the employee's functional abilities, if requested.

STEP 3: DEVELOP A RETURN-TO-WORK PLAN

The employee, the RTW designate, and the healthcare provider (if needed) must collaborate to develop a formal RTW plan. This is to be included in the employee's individual accommodation plan. If the employee is deemed to have:

- *No residual functional limitations*, then they can return to their regular position with no accommodation required
- *Temporary functional limitations*, then they can return to a temporary modified work environment with accommodation, or to an alternative transitional position, if available or possible
- *Lasting functional limitations*, then they can return to work with permanent accommodations or is permanently reassigned to another position, if available or possible

STEP 4: MONITOR AND EVALUATE THE RETURN-TO-WORK PROCESS

The employee, supervisor, and RTW designate then monitor and review the RTW process regularly until it has been completed. If the employee encounters challenges, the RTW plan is to be modified in order to overcome these challenges.

Schedules

SCHEDULE A: Individualized Employee Emergency Response Information Form

SCHEDULE B: Worksheet for Individual Emergency Response Plans

SCHEDULE C: Individual Accommodation Plan

SCHEDULE D: Customer Feedback Form



Individualized Employee Emergency Response Information Form

Use the information collected in the emergency response worksheet to create an individualized workplace emergency response for each employee with a disability. Modify this form if an employee needs different types of accommodations for different types of emergencies.

All information in this document is confidential and will be shared only with the employee's consent.

EMPLOYEE INFORMATION

Name: _____

Department: _____

Telephone: _____ Mobile phone: _____ E-mail: _____

EMERGENCY CONTACT INFORMATION

Name: _____

Telephone: _____ Mobile phone: _____ E-mail: _____

Relationship: _____

WORK LOCATION

(Repeat for other work locations)

Address: _____

Floor: _____

Room name/number: _____

EMERGENCY ALERTS

[Name of employee] will be informed of an emergency situation by:

- Existing alarm system
- Pager device
- Visual alarm system
- Co-worker
-

Other (specify): _____

ASSISTANCE METHODS

List types of assistance (e.g., staff assistance or transfer instructions).



Worksheet for Individual Emergency Response Plans

The employee with a disability completes this worksheet with their manager to help identify threats to the employee's safety that could arise in an emergency situation. The worksheet is also used to provide suggestions on how to overcome the identified threats.

The information collected is confidential and will be shared only with the employee's consent. They do not have to provide details of their medical condition or disability—only about the type of help they may need in an emergency.

Date: _____

EMPLOYEE INFORMATION

Name: _____

Department: _____

Telephone: _____ Mobile phone: _____ E-mail: _____

EMERGENCY CONTACT INFORMATION

Name: _____

Telephone: _____ Mobile phone: _____ E-mail: _____

Relationship: _____

WORKPLACE LOCATION

1. Where do you work?

Address: _____

Floor: _____ Room name/number: _____

2. Do you work in different places on a regular basis?

Yes

No

List the addresses, floors, and room locations. (Use additional sheets as necessary.)



POTENTIAL EMERGENCY RESPONSE BARRIERS

3. Can you read/access our emergency information?

- Yes
- No

If not, what would make this information accessible to you? (Use additional sheets as necessary.)

4. Can you see or hear the fire/security alarm signal?

- Yes
- No
- I don't know

If not, what would help you to know the alarm was flashing or ringing? (Use additional sheets as necessary.)

5. Can you activate the fire/security alarm system?

- Yes
- No
- I don't know

If not, what would help you to sound the alarm? (Use additional sheets as necessary.)

6. Can you talk to emergency staff?

- Yes
- No

If not, what would help you to communicate with them? (Use additional sheets as necessary.)



Individual Accommodation Plan

Employee's name: _____ Date: _____

Employee's title/department: _____ Manager: _____

Limitations	Job-related tasks/activities affected by limitations	Is this an essential job requirement?

Sources of expert input into the individual accommodation plan (e.g., human resources manager, family doctor, specialists):

Accommodation measures are to be implemented from [start date] to [end date].

If no end date is expected, the next review of this accommodation plan will occur on [review date].

(The accommodation measure(s) should be reviewed annually, at a minimum.)

Description of Accommodation Measure(s)

Which job requirements and related tasks require accommodation?	What are the objectives of the accommodation (i.e., what must the accommodation do to be successful)?	Which accommodation strategies/tools have been selected to facilitate this task/activity?



Roles and Responsibilities

Outstanding actions to implement accommodation	Assigned to	Due date

Additional Documents Included

Document	Yes	No
Emergency Plan		
Accessible Communications		
Return-to-Work Plan		

Employee's signature

Manager's signature



Customer Feedback Form

Thank you for visiting Willowgrove. We value all our customers and strive to meet everyone's needs. Please tell us the date and location of your visit:

Date: _____ Location: _____

1. Were you satisfied with the customer service we provided you?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
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Comments

2. Was our customer service provided to you in an accessible manner?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
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Comments

3. Did you experience any problems accessing our goods and services?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
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Comments

Contact Information (optional)

Name: _____ Phone Number: _____

Email: _____