

## A 2.10.1 Multi-Year Accessibility Plan – Integrated Accessibility Standards

### Introduction

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act* (the “AODA”). The AODA requires that effective January 1, 2014, Sunrise North Senior Living, Ltd. (“Sunrise”) establish, implement, maintain and document a multi-year accessibility plan which outlines its strategy to prevent and remove barriers for persons with disabilities and to meet its requirements of the Integrated Accessibility Standards (the “IAS”).

This multi-year accessibility plan (the “Accessibility Plan”) outlines Sunrise’s strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS in order that Sunrise may fulfill its commitment as outlined in Sunrise’s Integrated Accessibility Standards Policy.

Note the Accessibility Plan applies only to Sunrise’s operations in Ontario, Canada.

	Deliverables	Activities	Responsibility	Legislative Deadline	Action	
					Completed	Pending/In Progress
<b>General: Establishing Accessibility Policies</b>						
a) Develop, implement and maintain polices governing how Sunrise achieves or will achieve accessibility through meeting the requirements of the IAS.	Sunrise Integrated Accessibility policy	Obtain final internal review and post to Teamlink	Regional Director of Operations and Human Resources	January 1, 2014	X	
b) Statement of	Posting on Sunrise Senior Living website regarding commitment to IAS. Draft additional formats of same that can be available upon	Obtain final review and obtain assistance from IT to post on Teamlink and Sunrise Senior Living website	Regional Director of Operations, Human Resources			

Sunrise North Senior Living, Ltd. – Multi-Year Accessibility Plan

<p>organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.</p> <p>c) Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.</p>	<p>request.</p>					
<b>General: Accessibility Plans</b>						
<p>a) Establish, implement, maintain and document a multi-year accessibility plan, which outlines Sunrise’s strategy to prevent and remove barriers and meet requirements of IAS.</p> <p>b) Post the accessibility plan on the website, if any, and provide the plan in an accessible format upon request.</p>	<p>Completed accessibility plan with ongoing strategy</p> <p>Accessibility plan posted on Teamlink and Sunrise Senior Living website</p> <p>Document future action steps</p>	<p>Obtain input from related departments and finalize document</p> <p>Obtain assistance from IT for posting</p> <p>Assign ongoing review to appropriate person and establish process</p>	<p>Regional Director of Operations, Facilities and Human Resources</p> <p>Regional Director of Operations and Human Resources</p> <p>Regional Director of Operations, Human Resources and Facilities</p>	<p>January 1, 2014</p>	<p>X</p>	

c) Review and update the accessibility plan at least once every five years.						
<b>General: Self Service Kiosks</b>						
a) Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Accessibility standards communicated to Purchasing	Communicate AODA standards to IT and technology project teams, post on Teamlink	Regional Director of Operations, IT	January 1, 2014	X	
<b>General: Training</b>						
a) Provide training on the requirements of the accessibility standards referred to in the IAS and the Human Rights Code as it pertains to persons with disabilities to: <ul style="list-style-type: none"> <li>➤ All team members and volunteers</li> <li>➤ All persons who participate in developing the organization's</li> </ul>	Training resources available to all current and new team members and volunteers	Distribute training to communities, hold training for all team members and volunteers, track completion and establish new hire training process	Regional Director of Operations and Executive Directors	January 1, 2015	X	

<p>policies</p> <p>b) The training required in subsection 1 is appropriate to the duties of team members, volunteers and other persons</p> <p>c) Training is done as soon as practicable</p> <p>d) Training is provided on changes to policies and on an ongoing basis</p> <p>e) Training records are maintained for all training, including the date of training and the number of individuals in attendance.</p>	<p>Effective training tracking implemented</p> <p>Also require contractors to represent and warrant that the required training has been completed by their employees and the date such training was completed.</p>	<p>Obtain training code for the Learning Channel, utilize Sunrise training log for sign in process, upload participants to the Learning Channel for overall community tracking</p>	<p>Regional Director of Operations, Human Resources, Sunrise University team</p>			
<b>General: Compliance Reporting</b>						
<p>a) Ensure Sunrise files online compliance reports in accordance with the Schedule established under IAS.</p>	<p>Reports filed online</p>	<p>Communicate process to EDs, enter data into the online portal, establish plan for future updates every 3 years</p>	<p>Regional Director of Operations and Executive Directors</p>	<p>December 31, 2014 and every 3 years thereafter.</p>	<p>X</p>	

<b>Information and Communications Standards: Feedback</b>						
<p>a) Ensure Sunrise processes for receiving and responding to feedback are accessible to person with disabilities by providing or arranging for accessible formats and communication supports upon request.</p> <p>b) Notify the public about the availability of accessible formats and communication supports.</p>	<p>Communication that indicates accessible formats and accessible formats are available</p>	<p>Include this requirement in policy and website posting</p>	<p>Regional Director of Operations and Human Resources</p>	<p>January 1, 2015</p>	<p>X</p>	
<b>Information and Communications Standards: Accessible Formats and Communication Supports</b>						
<p>a) Upon request provide or arrange for accessible formats and communication supports for persons with disabilities.</p> <p>➤ Provide in a timely manner that takes into account the person's</p>	<p>Accessible formats and communication supports are available upon request</p>	<p>Communicate this requirement as part of IAS training and establish resource to provide assistance with requests, determine tracking process</p>	<p>Regional Director of Operations and Human Resources, contact from Ethicspoint team</p>	<p>January 1, 2016</p>		<p>X</p>

<p>accessibility needs due to disability; and</p> <ul style="list-style-type: none"> <li>➤ Provide at a cost that is no more than the regular cost charged to other persons.</li> </ul> <p>b) Consult with the person making the request to determine the suitability of an accessible format or communication support.</p> <p>c) Notify the public about the availability of accessible formats and communication supports</p>						
<b>Information and Communications Standards: Emergency Procedure, Plan or Public Safety Information</b>						
<p>a) Upon request provide in an accessible format or with appropriate communication supports, Sunrise's emergency procedures, plans or public safety information that it makes available to the public.</p>	<p>For emergency procedures or public safety information that is made available to the public, ensure accessible formats and communications supports are made available upon request</p>	<p>Identify emergency procedures and public safety information made available to the public, training teams on this requirement through IAS training</p>	<p>Regional Director of Operations and Executive Director</p>	<p>January 1, 2012</p>	<p style="text-align: center;">X</p>	

<b>Information and Communications Standards: Accessible Websites and Web Content</b>						
a) Ensure the websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0: ➤ Level A ➤ Level AA	Ensure requirements are met	Verify compliance through IT	Regional Director of Operations, Human Resources, IT	January 1, 2014 (Level A) January 1, 2021 (Level AA)		X  <i>Website has not undergone a significant refresh since Jan. 1, 2014</i>
<b>Employment Standards: Recruitment, General</b>						
a) Notify team members and the public about the availability of accommodations for applicants with disabilities in Sunrise's recruitment process.	Communicate to applicants, team members and the public	Include notification of this option on our website and through our job posting process, provide training to communities	Human Resources and Talent Acquisition Team	January 1, 2016		X
<b>Employment Standards: Recruitment, Assessment or Selection Process</b>						
a) During recruitment process, notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the	Establish communication process for recruitment process  Process to capture this	Ensure this message is part of standard job posting and recruitment materials  Create process to capture this request and obtain	Human Resources, Talent Acquisition team  Human Resources	January 1, 2016		X

<p>materials or processes to be used.</p> <p>b) If the selected applicant requests accommodation, 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.</p>	request and ensure compliance	appropriate guidance for compliance				
<b>Employment Standards: Notice to Successful Applicants</b>						
<p>a) When making offers of employment, notify the successful applicant of Sunrise's policies for accommodating team members with disabilities.</p>	Onboarding materials that address this requirement	Continue notification of availability of accommodation in new hire packet	Human Resources	January 1, 2016		X
<b>Employment Standards: Informing Employees of Supports</b>						
<p>a) Inform team members of Sunrise's policies used to support team members with disabilities.</p> <p>b) Provide the above information as soon as practicable after the</p>	<p>Ongoing training resources</p> <p>Process to incorporate changes to existing policies and</p>	Utilize training ongoing with all new team members and current team members as required	Executive Directors, Human Resources	January 1, 2016		X



<p>team member begins employment.</p> <p>c) Provide updated information to team members whenever there is a material change to existing policies on the provision of job accommodations.</p>	<p>communicate to team members</p>					
<b>Employment Standards: Accessible Formats and Communication Supports for Employees</b>						
<p>a) Upon request, consult with a team member to provide or arrange for the provision of accessible formats and communication supports for information needed to perform team member's job and information generally available to team members in the workplace</p>	<p>Process for team members to request accommodations</p>	<p>Create process to notify team members that accommodations are available which includes steps to assess and provide accommodation</p>	<p>Human Resources to develop, Operations to utilize</p>	<p>January 1, 2016</p>		<p>X</p>
<b>Employment Standards: Workplace Emergency Response Information</b>						
<p>a) Provide individualized workplace emergency response information to team members who have a disability, if the disability is</p>	<p>Document individualized emergency response information for team members who have a disability</p>	<p>Document individualized emergency response information, communicate to others as necessary, develop plan</p>	<p>Human Resources, Executive Directors</p>	<p>January 1, 2012</p>	<p>X</p>	

<p>such that the individualized information is necessary and the employer is aware of the need for accommodation due to the team member's disability.</p> <p>b) If the team member provides consent, provide the team member's individualized workplace emergency response information to another person designated by the employer to provide assistance to the team member.</p> <p>c) Review the individualized workplace emergency response information when:</p> <ul style="list-style-type: none"> <li>i. the team member moves to a different work location;</li> <li>ii. the team member's overall accommodation needs or plans are reviewed; and</li> <li>iii. when the employer</li> </ul>		<p>to maintain current information going forward, communicate expectation to communities and identify a community process owner</p>				
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reviews its general emergency response information.						
<b>Employment Standards: Documented Individual Accommodation Plans</b>						
a) Develop and have in place a written process for the development of documented individual accommodation plans for team members with disabilities that includes all of the considerations set out in section 28(2) and (3) of the IAS.	Documented written process	Document a written process to ensure ongoing compliance	Human Resources	January 1, 2016		X
<b>Employment Standards: Return to Work Process</b>						
a) Develop and have a documented a return to work process team members who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.	Incorporate into current return to work process	Review current return to work process, incorporate steps to ensure accommodations are considered to facilitate the return to work	Human Resources, Risk Management	January 1, 2016		X
b) Ensure the return to work process outlines the action Sunrise will take to facilitate						

the team member's return to work and that it uses documented individual accommodation plans, if any.						
<b>Employment Standards: Performance Management</b>						
a) Take into account the accessibility needs of team members with disabilities, as well as individual accommodation plans, when applying performance management.	Effective performance process for all	Review current process and adapt to include consideration for individual accommodation plans	Human Resources	January 1, 2016		X
<b>Employment Standards: Career Development and Advancement</b>						
a) Take into account the accessibility needs of team members with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to team members with disabilities.	Effective career development process for all	Review current career development program to include consideration for individual accommodation plans	Human Resources	January 1, 2016		X

<b>Employment Standards: Redeployment</b>						
a) Take into account the accessibility needs of team members with disabilities, as well as individual accommodation plans, when redeploying team members with disabilities.			Human Resources	January 1, 2016		X
<b>Design of Public Spaces Standards: Redeployment</b>						
a) Ensure that construction and/or redevelopment of public spaces covered by the IAS complies with applicable accessibility requirements.	Ensure global communication of IAS and requirements	Through website, training and policies ensure information is available to all teams including facilities and development	Human Resources, Facilities, Development	January 1, 2017		X