

## Multi-Year Accessibility Plan

This 2023-2028 accessibility plan outlines the policies and actions that the Elm Hurst Inn & Spa will put in place to improve opportunities for people with disabilities.

### Statement of Commitment

Elm Hurst Inn & Spa is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act*. Please note that transportation is not included within our plan as it does not pertain to our environment.

Accessibility Requirement	<i>Elm Hurst Inn &amp; Spa Implementation Plan</i>			
	Individual(s)/ Department Responsible	Steps/ Action Plan	Due Date	Results
<b><i>General Responsibilities</i></b>				
<b>Accessibility Policies:</b> <ul style="list-style-type: none"> <li>• Elm Hurst Inn &amp; Spa will develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation.</li> <li>• Policies will include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.</li> </ul>	Human Resources Senior Manager	Accessibility for Ontarians with Disabilities Act Policy and feedback processes completed prior to due date.	September 2023	Completed  Accessible Customer Service Policy posted on <a href="http://www.elmhurstinn.com">www.elmhurstinn.com</a>

<ul style="list-style-type: none"> <li>• Policies will be publicly available and, on request, provide them in an accessible format.</li> <li>• With any changes made to Elm Hurst Inn &amp; Spa Accessibility policies, all parties shall be notified of such changes via Elmhurst Inn website.</li> </ul>				
<p><b>Accessibility Plan</b> Elm Hurst Inn &amp; Spa will establish, implement, maintain and document a multi-year accessibility plan.</p> <ul style="list-style-type: none"> <li>• Develop a multi-year accessibility plan.</li> <li>• Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>• Review and update the accessibility plan at least once every five years.</li> <li>• Ensure the multi-year accessibility plan reflects accessibility-related policies.</li> </ul>	Human Resources Senior Manager	<p>Elm Hurst Inn &amp; Spa has a comprehensive accessibility plan.</p> <p>Work with a 3<sup>rd</sup> party consultant to develop Elm Hurst Inn &amp; Spa multi-year accessibility plan to address the requirements to be met between 2014 and 2024</p>	Next review date: Sept. 2027	<p>Completed</p> <p>Posted on the website <a href="http://www.elmhurstinn.com">www.elmhurstinn.com</a></p>
<p><b>Training</b> Elm Hurst Inn &amp; Spa will provide training to all employees, volunteers, persons participating in developing policies and all others who provide goods, services, or facilities on behalf of the organization:</p> <ul style="list-style-type: none"> <li>• Human Rights Code as it pertains to persons with disabilities.</li> <li>• Accessibilities Standards in the regulation as it relates to the assigned duties of the above</li> <li>• On-going training based on changes to policies.</li> </ul> <p>Elm Hurst Inn &amp; Spa will keep a record of training, electronically.</p>	Human Resources Senior Manager	<p>Utilizing a training platform to ensure compliant training.</p> <p>Training is provided with orientation.</p>	Next review date: Sept 2027	Completed, Continuous

## **Information & Communication Standards**

<p><b>Feedback Process</b></p> <ul style="list-style-type: none"> <li>• Elm Hurst Inn &amp; Spa will develop a process for receiving and responding to feedback. The process must be accessible, typically this includes offering multiple ways to provide the feedback or arranging for alternates if requested.</li> <li>• Elm Hurst Inn &amp; Spa will notify the public about the availability of accessible formats and communications supports with respect to the feedback process.</li> </ul>	<p>Human Resources Senior Manager</p>	<p>Included within the Accessibility for Ontarians with Disabilities Act Policy.</p>	<p>Next review date: Sept 2027</p>	<p>Completed  Posted on website www.elmhurstinn.com</p>
<p><b>Accessible Formats and Communication Support</b></p> <ul style="list-style-type: none"> <li>• Upon request, Elm Hurst Inn &amp; Spa will provide or arrange to provide accessible formats and communication supports for persons with disabilities: <ul style="list-style-type: none"> <li>○ In a mutually agreed upon timely manner that takes into account the person's accessibility needs;</li> <li>○ At a cost that is no more than the regular cost charged to other persons.</li> </ul> </li> <li>• Elm Hurst Inn &amp; Spa will consult with the person making the request to determine the suitability of an accessible format or communication support.</li> </ul>	<p>Human Resources Senior Manager</p>	<p>Elm Hurst Inn &amp; Spa to work with individuals to determine reasonable solutions.</p>	<p>Next review date: Sept 2027</p>	<p>Completed, continuous based on requests.  Posted on website www.elmhurstinn.com</p>
<p><b>Emergency Procedure, Plans and Public Safety Information</b></p> <p>If emergency procedures and public safety information are available to the public – we will provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p>	<p>Human Resources Senior Manager</p>		<p>Next review date: Sept 2027</p>	<p>Continuous based on requests</p>
<p><b>Accessible Websites and Web Content</b></p> <p>Internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing</p>	<p>Senior Manager – Marketing, Communications &amp; Creative</p>	<p>Elm Hurst Inn &amp; Spa will ensure that any new websites and</p>	<p>Next review date: Sept 2027</p>	<p>Ongoing based on website changes</p>

to Level AA, and shall do so in accordance with the schedule set out in this section.

- By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.
- By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than,
  - i. success criteria 1.2.4 Captions (Live), and
  - ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded).

*“new internet website” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh;*

*“Web Content Accessibility Guidelines” means the World Wide Web Consortium Recommendation, dated December 2008, entitled [“Web Content Accessibility Guidelines \(WCAG\) 2.0”](#)*

content will conform to guidelines.

Elm Hurst Inn & Spa performed an audit of its website to address compliance with WCAG 2.0 Level AA.

Website that are not new and do not meet the definition will be updated in accordance with SCAG 2.0 Level AA

### **Customer Service Standards**

**Qualifying a Service Animal**

In the event that an individual visiting or accessing services from Elm Hurst Inn & Spa requires the use of a Service Animal, the following guidelines will be used:

- 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
- 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.

Human Resources Senior Manager

Human Resources and/or Management will align to qualification standards, if/when a Service Animal is present

Completed, continuous based on requests

<p><b>Approved Regulated Health Professionals:</b></p> <ul style="list-style-type: none"> <li>i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.</li> <li>ii. A member of the College of Chiropractors of Ontario.</li> <li>iii. A member of the College of Nurses of Ontario.</li> <li>iv. A member of the College of Occupational Therapists of Ontario.</li> <li>v. A member of the College of Optometrists of Ontario.</li> <li>vi. A member of the College of Physicians and Surgeons of Ontario.</li> <li>vii. A member of the College of Physiotherapists of Ontario.</li> <li>viii. A member of the College of Psychologists of Ontario.</li> <li>ix. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.</li> </ul>				
<p><b>Policy Development</b>  Elm Hurst Inn &amp; Spa will develop, implement and maintain policies related to the provision of goods, services or facilities that is consistent with dignity and independence, integration, equal opportunity.</p> <ul style="list-style-type: none"> <li>• Instructions on how to interact and communicate with customers with various types of disabilities;</li> <li>• Instructions on how to interact with people with disabilities who use assistive devices; require the assistance of a guide dog, service animal or service dog; or require the use of a support person;</li> <li>• Instructions on how to use equipment or devices that are available at your premises or that may assist customers with disabilities;</li> <li>• Instructions on what to do if a customer with a disability is having difficulty accessing your services;</li> <li>• Policies, procedures and practices surrounding the legislation.</li> </ul>	<p>Human Resources Senior Manager</p>	<p>Accessibility for Ontarians with Disabilities Act Policy and feedback processes completed prior to due date.</p>	<p>Next review date: Sept 2027</p>	<p>Completed</p> <p>Incorporated into handbooks with all policies.</p> <p>Accessibility policies will be posted on the website.</p> <p>Updates and changes to handbook are deployed immediately to both full and part time.</p>
<p><b>Availability of Policy</b></p> <ul style="list-style-type: none"> <li>• On request, shall give a copy of any such document to any person.</li> </ul>	<p>Human Resources Senior Manager</p>			<p>Completed</p>

<ul style="list-style-type: none"> <li>shall notify persons to whom it provides goods, services or facilities that the documents are available on request. Appropriate notification includes: <ul style="list-style-type: none"> <li>by posting the information at a conspicuous place on premises owned or operated by the provider,</li> <li>by posting it on the provider's website, if any,</li> <li>or by such other method as is reasonable in the circumstances.</li> </ul> </li> </ul>			Next review date: Sept 2027	Accessible Customer Service Policy posted on the Elm Hurst Inn & Spa website as well individuals can request a copy or an accessible format.
<p><b>Notice of temporary disruptions</b></p> <p>If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, Elm Hurst Inn &amp; Spa will give notice of the disruption to the public as soon as possible, in different places and formats. Notice must include:</p> <ul style="list-style-type: none"> <li>what the disruption service is;</li> <li>the reason for the disruption;</li> <li>its anticipated duration; and</li> <li>a description of alternative facilities or services, if any, that are available.</li> </ul> <p>Prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.</p>	Human Resources Senior Manager	Elm Hurst Inn & Spa will work in accordance with the public in the event of any service disruption.	Next review date: Sept 2027	Completed, continue to work with Elm Hurst Inn & Spa in the event of disruption.
<p><b>Training</b></p> <ul style="list-style-type: none"> <li>All employees and volunteers;</li> <li>All other persons who provide goods, services or facilities on behalf of Elm Hurst Inn &amp; Spa; and</li> </ul>	Human Resources Senior Manager	Utilizing a training platform to ensure compliant training.		Completed, ongoing online training provided to new

<ul style="list-style-type: none"> <li>• All persons who participate in developing the Elm Hurst Inn &amp; Spa's policies.</li> <li>• Elm Hurst Inn &amp; Spa will keep a record of training that includes the dates training was provided and the number of employees who attended the training.</li> </ul> <p><b>Training will include:</b></p> <ol style="list-style-type: none"> <li>i. Information on AODA and the Integrated Standards;</li> <li>ii. Providing service with dignity, independence, Integration and equal opportunity;</li> <li>iii. Provisions of goods and services to persons with disabilities;</li> <li>iv. The use of assistive devices;</li> <li>v. The use of guide dogs, service animals and service dogs;</li> <li>vi. The use of support persons;</li> <li>vii. Notice of service disruptions; and</li> <li>viii. Customer feedback.</li> </ol>		<p>Provided to newly hired and returning employees.</p>		<p>employees and volunteers.</p>
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***Design of Public Spaces Standard***

<p><b>Accessible Parking</b> Ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain; the off-street parking facilities meet the requirements</p>	<p>Not applicable</p>	<p>Elm Hurst Inn &amp; Spa is responsible for parking.</p>	<p>n/a</p>	
<p><b>Obtaining Services</b> Organizations shall meet the requirements set out in this Part in respect of the following:</p> <ol style="list-style-type: none"> <li>1. All newly constructed service counters and fixed queuing guides.</li> <li>2. All newly constructed or redeveloped waiting areas.</li> </ol> <p>For the purposes of this Part, requirements for obtaining services in respect of service counters, fixed queuing</p>	<p>General Manager/ Facilities Manager</p>	<p>Elm Hurst Inn &amp; Spa will ensure that standards are achieved in the event of renovation or significant changes to the welcoming/ waiting area.</p>	<p>n/a</p>	<p>Accessibility and integration are a priority for Elm Hurst Inn &amp; Spa and as such we will partner with all visitors to remove barriers and increase accessibility.</p>

guides and waiting areas apply whether the services are obtained in buildings or out-of-doors.

**Service counters**

When constructing new service counters, which includes replacing existing service counters, the following requirements must be met:

1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters.
2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters.

The service counter that accommodates mobility aids must meet the following requirements:

1. The countertop height must be such that it is usable by a person seated in a mobility aid.
2. There must be sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required.
3. The floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid.

**Fixed queuing guides**

When constructing new fixed queuing guides, the following requirements must be met:

1. The fixed queuing guides must provide sufficient width to allow for the passage of mobility aids and mobility assistive devices.

<p>2. The fixed queuing guides must have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction.</p> <p>3. The fixed queuing guides must be cane detectable.</p> <p><b>Waiting areas</b> When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating must be accessible, but in no case shall there be fewer than one accessible seating space.</p> <p>Accessible seating is a space in the seating area where an individual using a mobility aid can wait.</p>				
<p><b>Maintaining Accessible Public Spaces</b> It is critical that public spaces, as well as the routes required to access them, are continuously maintained to support the mobility and independence of people with disabilities.</p> <p>Elm Hurst Inn &amp; Spa shall develop procedures for preventative and emergency maintenance of the accessible parts of their public spaces.</p>	<p>General Manager/ Facilities Manager (or appropriate authority)</p>	<p>Elm Hurst Inn &amp; Spa is responsible for maintaining accessible public spaces.</p>	<p>Next review date: Sept 2027</p>	
<p><b>Outdoor Paths</b> When constructing a new outdoor paths or redeveloping an existing outdoor path, Elm Hurst Inn &amp; Spa will do so in accordance with the Design of Public Spaces standards as per the AODA.</p>	<p>Not Applicable</p>		<p>n/a</p>	

<p><b>Outdoor Eating Areas</b> When constructing a new outdoor eating area or redeveloping an existing area, Elm Hurst Inn &amp; Spa will determine how many tables must be accessible in accordance with the Design of Public Spaces standards</p>	Not Applicable		n/a	
<b>Employment Standards</b>				
<p><b>Recruitment, Assessment or Selection Process</b> During a recruitment process, Elm Hurst Inn &amp; Spa will:</p> <ul style="list-style-type: none"> <li>• Notify employees and the public that Elm Hurst Inn &amp; Spa will accommodate the needs of people with disabilities during the hiring process.</li> <li>• 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 materials or processes to be used.</li> <li>• Notify successful applicants accommodation policies for accommodating employees with disabilities.</li> <li>• If a selected applicant requests an accommodation, Elm Hurst Inn &amp; Spa 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 due to disability.</li> </ul> <p><b>Notice to Successful Applicants</b> Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	Human Resources Senior Manager	<p>Statement to be included in all job postings:</p> <p>Elm Hurst Inn &amp; Spa welcomes diversity and inclusion in the workplace and encourages applications from all qualified individuals, including visible minorities, Indigenous People, and persons with disabilities. To request more information on our accessibility policies or to discuss any accommodations you may require in order to participate in the recruitment process (including alternate formats of materials or accessible meeting rooms) contact General Manager, Alon Gurman, Alon@elmhurstinn.com</p> <p>Statement within job offers: Elm Hurst Inn &amp; Spa is committed to accessibility, please review our policies contained within the provided handbook for more information on individual accommodation and accessibility.</p>		<p>Completed</p> <p>Continuous based on requests</p> <p>Completed</p>

<p><b>Informing Employees of Supports</b>  Elm Hurst Inn &amp; Spa will inform its 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 disability.</p> <p>Elm Hurst Inn &amp; Spa will provide the information related to the AODA and accommodation to new employees as soon as practicable after they begin their employment.</p> <p>Elm Hurst Inn &amp; Spa will provide updated information to its 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.</p>	<p>Human Resources  Senior Manager</p>	<p>Elm Hurst Inn &amp; Spa will provide new employees with accommodation information.</p>		<p>Completed</p> <p>Continuous based on request and/or policies/practice changes</p>
<p><b>Accessible Formats and Communication Supports for Employees:</b>  Where an employee with a disability so requests it, Elm Hurst Inn &amp; Spa will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:</p> <ul style="list-style-type: none"> <li>• information that is needed in order to perform the employee's job; and</li> <li>• information that is generally available to employees in the workplace.</li> </ul> <p>Elm Hurst Inn &amp; Spa consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>Human Resources  Senior Manager</p>			<p>Completed</p> <p>Continuous based on request</p>

<p><b>Workplace Emergency Response Information</b>  Elm Hurst Inn &amp; Spa provides individualized workplace emergency response information to employees who have a (temporary or permanent) disability, if the disability is such that the individualized information is necessary, and Elm Hurst Inn &amp; Spa is aware of the need for accommodation due to the employee's disability.</p> <p>If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, Elm Hurst Inn &amp; Spa will provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>Elm Hurst Inn &amp; Spa provides the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>Elm Hurst Inn &amp; Spa review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> <li>• when the employee moves to a different location in the organization;</li> <li>• when the employee's overall accommodations needs or plans are reviewed; and</li> <li>• when the employer reviews its general emergency response policies.</li> <li>• On medical appointment basis if applicable.</li> </ul>	<p>Human Resources  Senior Manager</p>			<p>Completed</p> <p>Continuous based on requests and/or awareness for accommodation</p>
<p><b>Documented Individual Accommodation Plans</b>  Elm Hurst Inn &amp; Spa shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<p>Human Resources  Senior Manager</p>	<p>Elm Hurst Inn &amp; Spa has an Accommodation Request and Individualized Plan that covers all of the required elements.</p>		<p>Completed</p> <p>Continuous based on requests and individual needs</p>

The process for the development of documented individual accommodation plans will include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans will:

The complete request and plan are included within both the full time and part time handbook.

*Please see Employee Accommodation within Elm Hurst Inn & Spa Handbooks.*

<p>a) if requested, include any information regarding accessible formats and communications supports provided,</p> <p>b) if required, include individualized workplace emergency response information,</p> <p>c) identify any other accommodation that is to be provided. Job tasks that will be accommodated based on individual needs.</p>				
<p><b>Return to Work Process</b>  Elm Hurst Inn &amp; Spa will develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and will document the process.</p> <p>The return to work process will:</p> <ul style="list-style-type: none"> <li>• outline the steps Elm Hurst Inn &amp; Spa will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</li> <li>• use documented individual accommodation plans as part of the process.</li> </ul> <p>The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	<p>Human Resources  Senior Manager/  Management</p>			<p>Completed</p> <p>Continuous based on requests and individual needs</p>
<p><b>Performance Management</b>  An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<p>Human Resources  Senior Manager/  Management</p>			<p>Completed</p> <p>Continuous based on requests and individual needs</p>

<p>“performance management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.</p>				
<p><b>Career Development and Advancement</b>  An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p> <p>“career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.</p>	<p>Human Resources  Senior Manager/  Management</p>			<p>Completed</p> <p>Continuous based on requests and individual needs</p>
<p><b>Redeployment</b>  An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p> <p>“redeployment” means 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.</p>	<p>Human Resources  Senior Manager/  Management</p>			<p>Completed</p> <p>Continuous based on internal changes</p>

## Review and Update

The plan is reviewed continuously to ensure alignment with identified timelines. At minimum the plan will be formally reviewed and updated at least once every five (5) years.

Formal review and update completed on: September 2023

Formal review and update completed on: September 2027

Formal review and update completed on:

**Alon Gurman** General Manager \_\_\_\_\_

Signature

\_\_\_\_\_ September 30, 2023

Date