

## Accessibility for Ontarians with Disabilities Act (AODA) 2005 Integrated Accessibility Standards Policy

### Policy

The Mennonite New Life Centre of Toronto (MNLCT) is committed to ensuring that all clients with disabilities receive services in a manner that is consistent with the principles of dignity, independence, integration, and equal opportunity.

We are committed to meeting the needs of people with disabilities and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (the Act).

### Scope

This policy applies to all employees, volunteers, placement students, board members and contractors, who are employed or provide services at the Mennonite New Life Centre of Toronto.

### Definitions

#### ***Barrier***

Defined by the Accessibility for Ontarians with Disabilities Act, 2005, as anything that prevents a person with a disability from fully participating in all aspects of society. Barriers can be physical, architectural, information, communication, attitudinal, technological, policy, procedure, or practice.

#### ***Disability***

Defined by the Accessibility for Ontarians with Disabilities Act, 2005 and the Ontario Human Rights Code, as:

- 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

#### ***Service Animal***

A trained animal that is on service supporting the person with disability.

### ***Support Person***

A person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services.

## **Accessibility Plan**

The MNLCT will develop, maintain and document an Accessibility Plan outlining the Centre's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the company's website. Upon request, the MNLCT will provide a copy of the Accessibility Plan in an accessible format.

## **Responsibilities**

The Integrated Accessibility Standards Regulation (191/11) encompasses multiple standards with phased-in timelines to break down barriers and increase accessibility for people with disabilities in the areas of information and communication, employment and built standards and these are:

1. General Requirements
2. Information and Communications Standard Requirements
3. Employment Standard Requirements
4. Design of Public Spaces Standard Requirement

### **General Requirements**

- Develop, implement, and update policies, practices and procedures under the Integrated Accessibility Standards Regulation (191/11);
- Develop, implement, and update a multi-year accessibility plan at least once every five years;
- Provide training to employees, volunteers, interns, placements and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities;
- Make documents publicly available and provide them in accessible format upon request.

### **Information and Communications Standards**

#### **Communication**

MNLCT will communicate with people with disabilities in way that is appropriate either by phone, fax, website, email, mail, or/and iCent application.

MNLCT will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

### **Telephone Services**

MNLCT is committed to providing accessible telephone service to clients. Staff will be trained on how to communicate with clients over the telephone in clear and plain language and to speak clearly and slowly. MNLCT will offer to communicate with customers by mail, email, website, fax and/or in-person, where necessary in the cases where telephone does not comply with client's requirements.

### **Accessible Formats and Communication Supports**

MNLCT is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from services. MNLCT will provide printed accessible information and communication support at no cost to any person upon request.

Upon request, MNLCT will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

MNLCT will consult with the person making the request in determining the suitability of an accessible format or communication support and will also notify the public about the availability of accessible formats and communication supports.

### **Accessible Websites and Web Content**

The MNLCT will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

### **Use of Support Persons**

Any person with a disability who is accompanied by a support person may access all MNLCT services. At no time will a person with a disability, who is accompanied by a support person, be prevented from having access to his or her support person while on premise. Any client attending an MNLCT event where admission or cover charges apply will not be asked to pay for a support person, if needed.

### **Use of Service Animals**

MNLCT will welcome people with disabilities who are accompanied by a service animal anywhere onsite that is open to the public and third parties. MNLCT will ensure that all staff, volunteers, and others serving the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

### **Notice of Temporary Disruption**

MNLCT will provide clients with notice in the event of a planned or unexpected disruption in services or access to facilities usually used by person with disabilities. Notices will be placed at the MNLCT website, phone system, iCent application, email, and all public entrances at each service location where the disruption will be in effect. The notice will include information about the reason for the disruption, anticipated duration, and if available, information on alternate facilities or services that can be accessed or used during the disruption.

## **Employment Standard Requirements**

### **Recruitment, Assessment or Selection Process**

The MNLCT will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

The MNLCT will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the MNLCT 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.

### **Notice to Successful Applicants**

When making offers of employment, the MNLCT will notify the successful applicant of its policies for accommodating employees with disabilities.

### **Informing Employees of Supports**

The MNLCT will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

### **Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, the MNLCT will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the MNLCT will consult with the employee making the request.

### **Workplace Emergency Response Information**

The MNLCT will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the MNLCT is aware of the need for accommodation due to the employee's disability. The MNLCT will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, the MNLCT will, with the consent of the employee, provide the workplace emergency response information to the person designated by the MNLCT to provide assistance to the employee.

The MNLCT will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

### **Documented Individual Accommodation Plans**

The MNLCT will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

### **Return-to-Work Process**

The MNLCT maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return-to-work process outlines the steps MNLCT will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return-to-work process will not replace or override any other return-to-work process created by or under any other statute.

### **Performance Management, Career Development and Advancement & Redeployment**

The MNLCT will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

### **Public Spaces Standard Requirement**

Construction, remodulations, relocation of public spaces should comply with the Accessibility Standards for the Design of Public Spaces.

### **Training**

MNLCT will provide training to all staff, volunteers, interns, and contractors and all those who are involved in the development and approvals of service standards, practices and procedures. Staff, volunteers, interns and contractors who are newly hired by MNLCT will receive this training during their orientation and no later than 30 days after their hire date.

The training will include the following:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the requirements of the customer service standard;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a support person or a service animal;
- What to do if a person with a disability is having difficulty in accessing MNLCT services;
- MNLCT policies, practices and procedures relating to the AODA customer service standards.

The following people/positions shall take lead responsibility with respect to this:

- The HR department shall ensure that all newly hired staff members undergo training as part of their orientation;
- Managers shall ensure all placement students undergo training as part of their orientation to their placement;
- Managers of volunteers shall ensure all volunteers undergo training as part of their orientation to their position;
- Staff, students and volunteers shall report completion of this training to the appropriate person, within one month of their date of hire/placement.

Applicable staff, volunteers, interns, and contractors will be trained on policies practices and procedures that affect the way services are provided to people with disabilities. Training will be provided on an ongoing basis when changes are made to these policies, practices and procedures. Refreshment training will be provided every three years.

### **Feedback**

Feedback can be made via our accessible webpages, email to [info@mnlct.org](mailto:info@mnlct.org), telephone, through a suggestion box located at each office, and/or verbally. All feedback will be directed to the Human Resources Department. Clients can expect to receive a reply within 2 weeks if contact information is available.

### **Changes to this policy**

Any policy or procedure that does not respect and promote the dignity, independence, integration, and equal opportunity of people with disabilities will be modified or removed.

MNLCT endeavors to review all policies and procedures on an annual basis during the month of January. Changes to this policy will be made where there has been careful consideration such that the changes will only positively impact people with disabilities.