

MNjcc Accessible Customer Service Policy

(Updated December 2023)

Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

MNjcc is committed to developing policies, practices, and procedures that provide accessible quality services to its members, guests, staff and volunteers. Services will be provided to customers with disabilities in a manner that promotes and respects dignity, independence, integration and equal opportunity. The J is dedicated to ensuring all programs, services and events are accessible to customers by Ontario Regulation 429.07 Accessibility Standards for Customer Services.

Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by the Miles Nadal Jewish Community Centre.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of the Miles Nadal Jewish Community Centre, including when the provision of goods and services occurs off the premises of the Miles Nadal Jewish Community Centre such as in: delivery services, call centres, vendors, drivers, catering and third party marketing agencies.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by the Miles Nadal Jewish Community Centre.
- d) This policy shall also apply to all persons who participate in the development of the Miles Nadal Jewish Community Centre's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Definitions

Assistive Device –a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in the *Health Protection and Promotion Act, Ontario Regulation 562* adog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability;
- or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care, medical needs or access to goods and services.

MNjcc endeavours to ensure that the Accessibility Policy and related practices and procedures are consistent with the following four (4) core principles:

1. **Dignity** - Persons with a disability must be treated as valued customers and deserving of service as any other customer.
2. **Equality of Opportunity** - Persons with a disability should be given an opportunity equal to that given to others to obtain, use and benefit from our services.

3. **Integration** - Wherever possible, persons with a disability should benefit from our services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, services will, to the extent possible, be provided in another way that takes into account the person's individual needs.
4. **Independence** – Services shall be provided in a way that respects the independence of persons with a disability. To this end, we will always be willing to assist a person with a disability but will not do so without the express permission of the person.

MNjcc is also committed to providing Accessible Customer Service in the following additional areas:

Communication

We are committed to communicating with customers, staff and volunteers with disabilities in different or alternative ways that take into consideration their disability. Any MNjcc public information, for example, information on our websites, will be made accessible to an individual who requests it in an alternative format as soon as possible wherever possible, including via email, mail, verbally over the phone and orally in person at the Customer Service Desks or in a meeting.

Staff are trained on how to interact and communicate with customers with disabilities in a manner that is respectful of a customer's dignity and independence.

Alternative methods of communication shall be provided as requested. Staff will be trained to communicate with customers over the telephone in an articulate manner and to speak clearly and answer questions patiently.

Use of Assistive Devices and Support Persons

Assistive Devices, guide animals and/or support persons may be used by customers to assist in accessing services at the MNjcc. We may require a person with a disability to be accompanied by a support person where it is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.

Support persons will not be required to pay entrance fees, where applicable when accompanying and providing aid to a customer with disabilities. All service animals must have proof of inoculations/vaccinations required under the Childcare Centre Early Years Act and the Toronto Operating Criteria. Staff and volunteers will be properly trained in how to interact with customers with disabilities who are accompanied by a service animal, a support person or an assistive device.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and the business. Or, where elevators are not present and where an individual requires assistive devices for mobility, service will be provided in a location that meets the needs of the customer.

Assistive devices provided by Miles Nadal Jewish Community Centre:

The following assistive devices are available on a first come, first served basis and upon request, to assist customers in accessing our goods and services:

- Personal Hearing Assist Device (Al Green Theatre only)
- Wheelchair

Food Service Areas:

A customer with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are operated by the MNjcc and open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) the Miles Nadal Jewish Community Centre will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws:

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or a regulation under this or any other Act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive about controls or bans on these breeds prevails.

Care and Control of the Animal:

The customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, the Miles Nadal Jewish Community Centre will make all reasonable efforts to meet the needs of all individuals.

Notice of Temporary Disruptions

MNjcc will notify customers if there is a planned or unexpected disruption of a facility or service that persons with a disability use to access our services. The notice will be posted at the entrance of the applicable premises as well as being provided verbally, electronically or in person as applicable. The notice will include the following information:

- That a facility or service is unavailable.
- The anticipated duration of the disruption.
- The reason for the disruption.
- Alternative facilities or services, if available.

Notifications Options:

When disruptions occur the Miles Nadal Jewish Community Centre will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Miles Nadal Jewish Community Centre and/or Al Green Theatre website;
- contacting customers with appointments with MNjcc staff.
- Contacting rental groups via their designated person of contact.
- verbally notifying customers, where possible, when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Feedback Procedure

AODA requires Organizations to implement a feedback method that allows clients to provide feedback on perceived barriers, including how to ask for assistance.

MNjcc accepts feedback in a variety of ways including in person, by telephone, in writing or electronically via email and/or through the Contact Us section of our website. Our feedback protocol requires the MNjcc to respond to all customer inquiries within 3 business days.

Submitting Feedback: Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Miles Nadal Jewish Community Centre employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Training and Records

MNjcc provides training at the time of hire and ongoing training as required under the Act, to all persons to whom this Policy applies as well as to those persons charged with developing this Policy and related procedures and practices.

1. Content of Training Training will include:

- A review of the purpose of the Accessibility Legislation and requirements of the Accessibilities Standards.
- A review of the MNjcc Accessibility Policy.
- How to interact and communicate with persons with various types of disabilities.
- How to interact with persons with a disability who use an assistive device or require the assistance of a service animal or support person.
- How to use equipment or devices made available on our premises to assist persons with a disability to obtain, use or benefit from our goods and services.
- What to do if a person with a disability is having difficulty accessing our premises and/or services.

2. Timing of Training

It is a condition of hire that all MNjcc employees, full-time and part-time, and volunteers complete the required training before their start date.

3. Documenting Training

Records of the training are maintained in the HR and stored in employee personnel files.

Employment Practices

The above AODA policies and procedures apply to all goods and services that are delivered by the MNjcc including services delivered in person, by telephone, electronically, visually, orally or by written materials. Alternative formats are available upon request.

All Accessibility Policies of the MNjcc are included in our staff handbook and available at our front desk. Accessibility training is a condition of hire and is elaborated upon during onboarding.

All workplace information, including emergency information, job descriptions, employment manuals, and health and safety information shall be provided to an employee in an alternative form if requested.

All job posts on our MNjcc website and external recruiting sites include information that informs the public that we will accommodate the needs of people with disabilities through all stages of the hiring process.

In addition, onboarding training, job training and talent and performance management are adapted where needed and where requested to accommodate staff with disabilities to afford them equal opportunities for career growth and development.

Employees returning to work from disability are catered to where possible with modified duties and/or adapted workspace devices as reflected in their return to work transition plan and advised by their medical practitioners.

MNjcc is an equal opportunity employer and is committed to fair and equal treatment of all our staff, volunteers and those who use our facilities and enjoy our services, including people with disabilities.