

CAMP NORTHLAND Accessibility Policy

Purpose and Application

Under the Accessibility for Ontarians with Disabilities Act, 2005 all municipalities must meet the requirements of accessibility standards established by regulation. This policy establishes the accessibility standards for customer service for Camp Northland (The Jewish Camp Council of Toronto), in accordance with Ontario Regulation 429/07 and Ontario Regulation 191/11 (Integrated Accessibility Standards Regulation). This policy applies to all employees of Camp Northland, agents, volunteers and contracted service staff.

Definitions

Accessible means customer service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached, or entered; obtainable.

Disability means:

- a. Any degree of physical 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 impairment, 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,
- 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

Guide Dog means a dog trained as a guide for a blind person and having the qualifications prescribed by the Blind Persons' Rights Act R.S.O. 1990, c. B.7, s. 1 (1).

Service Animal is an 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/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.

Policy Statement

Camp Northland is committed to providing exceptional and accessible service to its customers. Goods and services will be provided in a manner that respects the *dignity and independence* to all customers. The provision of services to persons with disabilities will be *integrated* wherever possible. Persons with disabilities will be given an opportunity *equal* to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of Camp Northland.

Policy Requirements

1) Accessibility Training Policy

- a. Every person who deals with members of the public or who participates in developing Camp Northland's policies, practices and procedures governing the provision of goods and services to the public; including camp staff, volunteers, agents, contractors and others who provide service on behalf of Camp Northland will receive training regarding the provision of goods and services to persons with disabilities.
- b. The training will include the following information:
 - The purposes of the Accessibility for Ontarians with Disabilities Act,
 - How to interact and communicate with persons with various types of disabilities,
 - How to interact with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person
 - How to use equipment made available by the camp to help people with disabilities to access goods and services
 - What to do if a person with a disability is having difficulty accessing services.
- c. Training will be provided to each person according to his or her needs and duties and as soon as is practicable on an ongoing basis in connection with changes to policies, practices and procedures governing the provision of goods or services to persons with disabilities. A record of the dates on which training is provided and the number of individuals to whom it is provided will be kept.

2) Feedback Process

- a. Camp Northland accepts feedback from the public in a variety of methods including:
 - Phone
 - In person
 - Fax
 - Email
 - And, through feedback forms
- b. All feedback is reviewed by the Camp Director. Complaints are investigated and follow up is provided to the customer if requested.

3) Use of Service Animals and Support Persons

- a. If a person with a disability is accompanied by a guide dog or other service animal, Camp Northland will ensure that the person is permitted to enter Camp Northland's facilities with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, Camp Northland will ensure that other measures are available to enable the person with a disability to obtain, use and benefit from the camp's goods and services. When we cannot easily identify that an animal is a certified service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. The service animal must be under the care and control of the individual at all times. The following are conditions of having a service animal on site:
 - Owners are able to manage their animal's food, hygiene, health, safety and behaviour independently
 - The animal's presence in a cabin does not create physical or mental health issues for other campers or staff
 - If Camp Directors determine that having a specific certified service animal in camp is unworkable, the Directors will insist that the animal leave the premises

If service animals are prohibited by another law, or regulatory matter, or conflicting lawful interest, we will do the following to ensure people with disabilities can access our goods, services or facilities:

• Explain why the animal is excluded

- Discuss with the customer another way of providing goods, services or facilities
- b. If a person with a disability is accompanied by a support person, Camp Northland will ensure that both persons are permitted to enter the camp facilities, and that the person with a disability is not prevented from having access to the support person. Camp Northland may require a person with a disability to be accompanied by a support person when in a camp facility, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others in the facility. If an amount is payable by a support person for admission, or otherwise, to a premise, Camp Northland will ensure notice is given in advance about the amount.

4) Notice of Temporary Disruptions

- a. Camp Northland shall provide notice of disruption of services to the public.
- b. Any Notice of Disruption will contain the following:
 - Reason for the disruption
 - Anticipated duration
 - Alternative facilities or services
- c. Camp staff will provide such notice in at least one of the following three methods:
 - Notice physically posted at the site of the disruption
 - Notice on the camp website
 - Notice in local newspaper

5) Notice of availability of documents

a. Camp Northland will provide the public notice of the availability of the documents, required by the Accessibility Standards for Customer Service, (O. Reg 429/07) upon request. Notice of availability will be provided on Camp Northland's web site and through other printed methods.

6) Format of documents

a. If Camp Northland is required, by the Accessibility for Ontarians with Disabilities Act, 2005, to give a copy of a document to a person with a disability, the camp will take into account the person's ability to access the information and will provide the document or information contained in the document in a format that meets those needs as agreed upon with the person

7) Return to Work Policy

- a. Camp Northland will be fair, reasonable, and comply with all regulations and standards to assist in your return to work
 - This may include direct consultation with the Camp Director (or his designate), working collaboratively to a timely return to work while being sensitive and accommodating to the employees needs throughout the process

8) Related and Supporting Documentation

- a. Camp Northland's Policies
- b. Accessible Customer Service Training Records
- c. Ontario Regulation 429/07, Accessibility for Ontarians with Disabilities Act, 2005 – Accessibility Standards for Customer Service

The following form is available on our website (www.campnbb.com) and can be emailed, faxed, and/or printed and mailed upon request by contacting the office by email at https://www.campnbb.com) and can be emailed, faxed, and/or printed and mailed upon request by contacting the office by email at https://www.campnbb.com) and can be emailed, faxed, and/or printed and mailed upon request by contacting the office by email at https://www.campnbb.com) and can be emailed, faxed, and/or printed and mailed upon request by contacting the office by email at https://www.campnbb.com) or by calling 905-881-0018. Please note that the form below is a sample, only for use in viewing this policy.

INDIVIDUAL ACCOMMODATION PLAN PROCESS:

Camp Northland is committed to accommodating people with disabilities and will use the following process to identify and meet employee accommodation needs.

- 1. **Recognize the need for accommodation:** The process can be initiated in one of two ways:
 - a. Requested by the employee
 - b. Identified by the employee's manager or hiring manager
 - a) In some instances, an employee may not be able to identify his need for accommodation or communicate it due to the nature of the disability. As well, if the employee is new to his position, he may not be aware of the tools and processes involved in the job. Should a manager notice that an employee could be helped by an accommodation, the manager should discuss the availability of accommodation measures with the employee. For example, some mental health conditions make it difficult for an employee to identify specific needs or challenges. If the manager notices that an

employee is facing new challenges, rather than immediately addressing this as a performance management issue, the manager might consider whether the employee's actions are related to a disability that can be accommodated.

- c. Camp Northland will inform the employee of the steps taken to ensure the privacy of personal information. Protecting privacy can be done by using file storage and confidential forms
- 2. Gathering Relevant Information and Assessing Needs- our process is collaborative and the employee is actively involved in this step.
 - a. Camp Northland does not require details on the nature of the employee's disability to provide an accommodation; it needs to know only about the employee's functional abilities.
 - b. During this step, an employee may be asked to provide medical information, at Camp Northland's expense, that will help us or an external expert determine the appropriate accommodation measure. This may involve, for example, a functional capacity evaluation. This step is an important one in the accommodation process: It reassures employees that an objective accommodation process is in place in the organization.
 - c. During this stage, employees will be given the option to have a representative with them through the process. This can include. But is not limited, to a colleague, a Health and Safety Officer, a hiring manager. Employees will be asked to provide this request in a manner that works best for them, whether that be via email if there are no barriers to providing such, or verbally.
 - d. Camp Northland will inform employees of the steps that will be taken to ensure any electronic medical records are kept secure. This includes appropriate file storage and confidential forms. Camp Northland will review our privacy policy regularly to ensure that their procedures are adequate and meet their obligations to all of their employees.
 - e. Job accommodations can include accessible formats and communication supports for information, physical or structural modifications, changes in work demands and schedules, or the use of assistive devices. An accommodation allows an employee with a disability to fully access and participate in the workplace and to complete the same duties and requirements as other employees. It can be temporary or permanent, depending on the needs of the employee.
 - f. The employee and her manager evaluate potential options to find the most appropriate measure.
 - g. An external expert may be involved, at the company's expense.

3. Write an Individual Accommodation Plan

Once Camp Northland and the employee have agreed on the most appropriate accommodation(s), the details must be written down formally in an individual accommodation plan. Appendix A provides a sample of such a plan. The individual accommodation plan must include:

- a) What accommodations will be provided
- b) any information regarding accessible formats and communication supports provided, if requested;
 - the employee with a disability is often the best resource for determining how this can be accomplished efficiently.

Examples of accessible formats are:

- text-to-speech versions;
- Braille;
- large print;
- accessible PDFs;
- plain language versions;
- closed-captioning for videos.

Camp Northland will decide on the most appropriate accessible formats or communication supports for the employee. The format chosen will depend on both the needs of the employee and the capacity of the employer to provide the support.

- c) individualized workplace emergency response information, if required;
- d) any other accommodation that was identified during Step 2.
- e) When the plan will be reviewed and updated

If an individual accommodation is denied, the manager will provide the employee with the reason for the denial, in an accessible format.

4. Implement, Monitor and Update the Plan

The employee and her manager monitor the accommodation to ensure that it has effectively resolved the challenge:

- a) Formal reviews are conducted at a predetermined frequency.
- b) The employee's direct supervisor will set up a time to review the accommodation plan with her before the annual performance review so that the employee has all the tools in place to be productive in the workplace. Then, the performance review can be about performance, not accommodation.

- c) The accommodation plan is reviewed if the employee's work location or position changes.
- d) The accommodation is reviewed if the nature of the employee's disability changes.
- e) If the accommodation is no longer appropriate, the employee and the manager work together to gather relevant information and reassess the employee's needs in order for the employer to find the best accommodation measure (Step 2).