

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

## **POLICY:**

In fulfilling our mission to provide leadership in service to seniors and developmentally disabled individuals by dedicated staff and volunteers, Tri-County Mennonite Homes (TCMH) strives at all times to provide goods and services in a way that respects the dignity and independence of people with disabilities. TCMH is committed to giving people with disabilities the same opportunities to access and benefit equally from all of our goods and services in the same manner or similar manner as others and to be responsive to the needs of all our clients and customers. This policy outlines how all divisions will work together to provide excellent customer service to all clients/residents including those with disabilities.

## **PURPOSE:**

This policy is intended to meet the requirements of [Accessibility Standards for Customer Service, Ontario Regulations 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.

All goods and services provided by TCMH shall follow the principles of dignity, independence, integration and equal opportunity.

## **SCOPE:**

- This policy applies to the provision of goods and services owned and operated by TCMH.
- This policy applies to employees, physicians, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of TCMH, including when the provisions of goods and services occurs off the premises of TMCH.
- 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 TCMH.
- This policy shall also apply to all persons who participate in the development of the TCMH policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

## **ROLES AND RESPONSIBILITIES:**

### **TCMH Leadership Team:**

- Oversees the program corporately and in each division.

### **Managers Responsibilities:**

- Provide training and support to employees who communicate and/or support with clients or residents on how to interact with people of various disabilities.
- Track training completed by employees.
- Review and respond to feedback from customers.
- Post notices of disruption as required.

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

## **Employee's Responsibilities:**

- Provide customer service to all clients/residents including those with disabilities.

## **DEFINITIONS:**

**“Assistive Device:”** - Is 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, hearing aid or a personal oxygen tank that might assist them in hearing, seeing, communicating, moving breathing, remembering and/or reading.

**“Customers”** - For TCMH, customers include anyone who accesses our goods and service including for consistency residents, clients, visitors, families, and volunteers.

**“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 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;*
- *A condition of mental impairment or development 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 Insurance Act, 1997.*

**“Employee”** - Is defined as a person who performs work or supplies services to TCMH. This includes employees, contract staff and volunteers.

**“Guide Dog:”** - Is a highly-trained working dog that has been trained at one of the of the facilities listed in Ontario Regulation 58 under the [Blind](#)

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

[Persons' Right 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 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 *Health Protection and Promotion Act, Ontario Regulation 562* a dog 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, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

**“Supervisor” -**

Is defined as person who has charge of a workplace or authority over an employee.

**“Workplace” -**

Is defined as any place where an employee performs work, or is likely to be engaged in work. This may include, for instance, a motor vehicle or an off-site location. The definition of workplace may be interpreted differently under statues such as Human Rights and Worker’s Compensation Act.

**REFERENCES and RELATED POLICIES:**

Referenced Documents:

- [Accessibility for Ontarians with Disabilities Act, 2005](#)
- [Accessibility Standards for Customer Service, Ontario Regulation 429/07](#)
- [Blind Person’s Rights Act, 1990](#)
- [Dog Owners' Liability Act, Ontario](#)
- [Food Safety and Quality Act 2001, Ontario Regulation 31/05](#)
- [Health Protection and Promotion Act, Ontario Regulation 562](#)
- [Ontario Human Rights Code, 1990](#)

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

- [Ministry of Community and Social Service's website: e-Learning course "Serviceability: Transforming Ontario's Customers Service"](#).

## PROCEDURE:

In accordance with the *Accessibility Standards of Customer Service, Ontario Regulations 429/07*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities
- B. Use of Assistive Devices
- C. Communication
- D. The Use of Guide Dogs, Service Animals and Service Dogs
- E. The Use of Support Persons
- F. Notice of Service Disruptions
- G. Customer Feedback
- H. Training
- I. Notice of Availability and Format of Required Documents.

### **A. The Provision of Goods and Services to Persons with Disabilities**

TCMH will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

### **B. Use of Assistive Devices**

TCMH is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. TCMH will train employees, **when relevant**, to be familiar with various assistive devices that may be used by customers with disabilities.

#### **Customer's own assistive device(s):**

Persons with disability may use their own assistive devices as required when accessing goods or services provided by TCMH.

In the case where an assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example open flames and oxygen tanks cannot be near one another. Therefore, the

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

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 business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

### **C. Communication**

All employees of TCMH communicate with persons with a disability in a manner that takes into consideration the person's disability; enabling the persons with disabilities to communicate effectively for the purposes of using our goods and services. Communication includes the process of providing, sending, receiving and understanding information.

TCMH promotes independence and enables access to all goods and services by using assistive devices or communication services to change the usual method of communication, if necessary. The following are various methods that are used to optimize communication for persons with a disability:

- Large print materials
- Graphic and written signage.

TCMH supervisors will train employees who communicate with clients on how to interact and communicate with people with various disabilities.

### **Formats of Documents and Information**

Upon request, TCMH will provide documents (e.g. forms, print materials, bills, etc.) or the information contained within the documents in formats that take into account a person's disability.

The timeframe of the conversion process of the original document will vary depending on the media chosen, the size, complexity, quality of source documents and number of documents to be converted. Documents will be returned in a timely manner with considerations of these factors.

Should the requested documents contain information required by the customer sooner than the conversion will be ready; the information will be communicated in a way that is accessible to the customers.

Customers will not be charged fees for documents in alternative formats that exceed the fee charged for the documents in its original state.

### **D. The Use of Guide Dogs, Service Animals and Service Dogs**

People with disabilities have the right to be accompanied by their guide dog or service animal to enable independence in accessing goods and services open to the public while on TCMH premises, unless otherwise excluded by the law. Accommodation will be made for service

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

animals taking into consideration the safety of others and laws that exclude service animals. If a service animal is excluded by another law, other measures will be provided to ensure that the person with a disability is able to access goods and services. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

TCMH supervisors or designates will train employees in how to interact with persons with disabilities who are accompanied by a service animal.

TCMH employees will assist in locating outdoor space (if needed) and water for the service animal.

### **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 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) TCMH 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:**

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

### **Recognizing a Guide Dog, Service Dog and/or Service Animal:**

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, TCMH may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

### **Care and Control of the Animal:**

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

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

### **Allergies:**

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

### **E. The Use of Support Persons**

If a customer with a disability is accompanied by a support person, TCMH will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person. This access is to assist them with communication, mobility, personal care or medical needs to enable access to goods and services provided by TCMH.

There may be times where seating availability prevent the customer and support person from sitting beside each other. In these situations, TCMH will make every reasonable attempt to resolve the issue.

A support person may be a regulated health professional or unregulated person such as a family member, volunteer or friend. This policy on the use of support persons, regulated or unregulated, acknowledges the need to ensure confidentiality and adhere to TCMH Policies and Procedure. As such, support persons are expected to sign TCMH's confidentiality agreement, and review and agree with the various Policies and Practices. Where required, the support person will be asked to identify the disability-related service(s) he/she provides.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed. TCMH supervisors or designates will train employees in how to interact with persons with disabilities who are accompanied by a support person.

### **Admission Fees:**

If payment is required by a support person for admission to the premises TCMH will ensure that notice is given in advance by posting notice of admission fees for support persons where TCMH fees are posted.

### **F. Notice of Disruption in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of TCMH. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use TCMH's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

### Notifications will Include:

In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options.

Examples of when notices are provided include:

- reduced entrance/exit access due to maintenance or outbreak of illness
- reduced access to assistive devices due to maintenance, equipment malfunction, theft or other reasons
- elevators closed due to maintenance.

### Notifications Options:

When disruptions occur, TCMH 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 TCMH website;
- utilizing the TCMH phone system and website for messages
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

## **G. Feedback Process**

Feedback and comments on the quality of goods and services TCMH provides to people with disabilities are welcome and appreciated. All feedback will be reviewed and responded to.

Any person can contact TCMH employees with their questions, comments or concerns via email, in writing in person or using any other method. Feedback forms are available upon request.

## **H. Training**

Training will be provided to:

- all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of TCMH;
- those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
  - use assistive devices;
  - require the assistance of a guide dog, service dog or other service animal; or
  - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- TCMH's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

#### Training Schedule:

TCMH will provide training as soon as practical. Training will be provided during orientation to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

#### Record of Training:

TCMH will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

#### Notice of Availability and Format of Documents

TCMH shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by TCMH, the TCMH's website and/or any other reasonable method.

#### Access an e-learning course:

The training requirements can be fulfilled by completing the e-Learning course "Serve-ability: Transforming Ontario's Customers Service", which can be found on the Ministry of Community and Social Service's website:

<http://www.mcscs.gov.on.ca/mcss/serve-ability/splash.html>

This policy and its related procedures will be reviewed as required in the event of legislative changes.

#### **ATTACHMENTS:**

- [AODA Staff Acknowledge & Agreement Form](#)
- [AODA Plan](#)
- [AODA Customer Feedback Form](#)
- [AODA Notice of Disruption Form](#)

---

DEPARTMENT: HUMAN RESOURCES

SECTION: EMPLOYEE RELATIONS

SUBJECT: ACCESSIBLE CUSTOMER SERVICE

EFFECTIVE DATE: DECEMBER, 2013

---

- [AODA Request for Information in Alternative Format Form](#)
- [AODA Aldaview](#)
- [AODA Greenwood](#)
- [AODA Nithview](#)
- [AODA\\_TCMHomes](#)