



Accessible Customer Service Policy

1. Intent

- a. This policy replaces previous versions of AODA policies adopted in 2012/2013.
- b. 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*, [“**AODA**”] and applies to the **provision** of goods and services to the public or other third parties, not to the goods themselves.
- c. Provision of all goods and services by **Community Living Greater Sudbury** [“**CLGS**”] will be based upon principles of dignity, independence, integration and equal opportunity for all those receiving such goods and services by CLGS.

2. Scope

- a. This policy applies to the provision of goods and services at premises owned and operated by Community Living Greater Sudbury.
- 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 CLGS, including when

CLGS Policies & Procedures Manual Particulars

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Review Required	Annually	Next Review	2015-12		
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Statutory References	<i>Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005,</i>				
Other References	CLGS Complaints and Feedback Policy 2014-10.pdf				
Digital File Location	\\CLGSSBS\Management\Compliance\AODA\CLGS AODA Documents				

the provision of goods and services occurs off the premises of CLGS such as in: delivery services, call centers, 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 takes place at premises owned and operated by CLGS.
- d. This policy shall also apply to all persons who participate in the development of the CLGS's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

3. Definitions

- a. 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 or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.
- b. Disability – the term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:
 - i. 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;
 - ii. a condition of mental impairment or a developmental disability;
 - iii. a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
 - iv. a mental disorder; or
 - v. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
- c. 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.
- d. Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:
 - i. it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - ii. the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

- e. 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:
 - i. it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
 - ii. 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.
- f. 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.

4. General Principles

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

- a. The Provision of Goods and Services to Persons with Disabilities;
- b. The Use of Assistive Devices
- c. The Use of Guide Dogs, Service Animals and Service Dogs
- d. The Use of Support Persons
- e. Notice of Service Disruptions
- f. Customer Feedback
- g. Training
- h. Notice of Availability and Format of Required Documents

5. The Provision of Goods and Services to Persons with Disabilities

CLGS 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:

- a. ensuring that all customers receive the same value and quality;
- b. 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;
- c. 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;
- d. taking into account individual needs when providing goods and services; and
- e. communicating in a manner that takes into account the customer's disability.

6. Assistive Devices

- a. **Customer's own assistive device(s):**
 - i. Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by CLGS.

- ii. 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 to 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 CLGS. 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.

b. **Assistive devices provided by CLGS:**

- i. The following assistive devices will be made available on a first come, first serve basis and upon request, to assist customers in accessing CLGS goods and services:
 - (1) Walkers
 - (2) Walking Canes
 - (3) Wheelchairs

7. **Guide Dogs, Service Animals and Service Dogs**

- a. A customer with a disability who is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

b. **Food Service Areas:**

- i. A customer with a disability who is accompanied by a guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.
- ii. 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*.

c. **Exclusion Guidelines:**

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) CLGS 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).

d. **Applicable Laws:**

- i. 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.
- ii. *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.

- e. Recognizing a Guide Dog, Service Dog and/or Service Animal:
 - i. If it is not readily apparent that an animal is being used by the customer for reasons relating to his or her disability, CLGS may request verification from the customer.
 - ii. Verification may include:
 - (1) a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
 - (2) a valid identification card signed by the Attorney General of Canada; or,
 - (3) a certificate of training from a recognized guide dog or service animal training school.
- f. Care and Control of the Animal:

A 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 time.
- g. Allergies:

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

8. Support Persons

- a. If a customer with a disability is accompanied by a support person, CLGS 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.
- b. There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations CLGS will make every reasonable attempt to resolve the issue.
- c. 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.
- d. Admission Fees:

If payment is required by a support person for admission to the premises, CLGS will ensure that notice is given in advance by posting, wherever CLGS fees are posted, notice of any such admission fees for support persons..

9. Notice of Disruptions in Service

- a. Service disruptions may occur due to reasons that may or may not be within the control or knowledge of CLGS. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use CLGS'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.
- b. Notifications will Include:

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

- i. goods or services that are disrupted or unavailable;
- ii. the reasons for the disruption;
- iii. the anticipated duration of the disruption;
- iv. a description of alternative services or options.

c. Notifications Options:

When disruptions occur, CLGS will provide notice by:

- i. 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 CLGS website;
- ii. contacting customers with appointments;
- iii. verbally notifying customers when they are making a reservation or appointment; or
- iv. any other method that may be reasonable under the circumstances.

10. Feedback Process

- a. CLGS will provide customers with the opportunity to provide feedback on the service provided to customers with disabilities.
- b. Information about the feedback process will be readily available to all customers and notice of the process will be made available by posting on the CLGS website and bulletin boards as well as by oral advice to the customer as circumstances appear to warrant.
- c. Feedback forms, along with alternate methods of providing feedback, such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.
- d. CLGS has a comprehensive Complaints and Feedback process which may be utilized by any customer. See: [CLGS Complaints and Feedback Policy 2014-10.pdf](#)¹
- e. Submitting Feedback:
For ease of reference, customers can submit feedback to:
 - i. Feedback/Complaints Officer
 - ii. 705-671-7181 extension 217
 - iii. 303 York St. Sudbury ON P3E 2A5
 - iv. Feedback@clgs.ca
- f. Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so via the Feedback/Complaints Officer.
- g. Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted, all in accordance with the [CLGS Complaints and Feedback Policy](#).



11. Training

a. **Training will be provided to:**

- i. all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of CLGS; for example: salespersons, drivers, vendors, event operators, call centers and third party marketing agents; and,
- ii. those who are involved in the development and approval of customer service policies, practices and procedures.

b. **Training Provisions:**

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

- i. A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- ii. A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- iii. Instructions on how to interact and communicate with people with various types of disabilities.
- iv. Instructions on how to interact with people with disabilities who:
 - (1) use assistive devices;
 - (2) require the assistance of a guide dog, service dog or other service animal; or
 - (3) require the use of a support person (including the handling of admission fees).
- v. Instructions on how to use equipment or devices that are available at CLGS premises or that CLGS provides that may help people with disabilities.
- vi. Instructions on what to do if a person with a disability is having difficulty accessing your services.
- vii. CLGS's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

c. **Training Schedule:**

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

d. **Record of Training**

CLGS will keep a record of training that includes:

- i. the dates training was provided and
- ii. the number of employees who attended the training.

e. **Compliance Undertaking:**

All CLGS staff members and all those who receive training under this Policy will be required to sign and deliver an Acknowledgement and Agreement in the form appended to the end of this document.

12. Notice of Availability and Format of Documents

- a. CLGS will 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.
- b. Notification will be given by posting the information in a conspicuous place owned and operated by CLGS, the CLGS website and/or any other reasonable method.

13. Administration

- a. Any questions or concerns about this policy or its related procedures may be addressed by contacting:
 - i. CLGS Feedback/Complaints Officer
 - ii. 705-671-7181 extension 217
 - iii. 303 York St. Sudbury ON P3E 2A5
 - iv. Feedback@clgs.ca
- b. This policy and its related procedures will be reviewed as required in the event of legislative changes.

14. Referenced Documents:

- a. Accessibility for Ontarians with Disabilities Act, 2005
- b. Accessibility Standards for Customer Service, Ontario Regulation 429/07
- c. Blind Person's Rights Act, 1990
- d. Dog Owners' Liability Act, Ontario
- e. Food Safety and Quality Act 2001, Ontario Regulation 31/05
- f. Health Protection and Promotion Act, Ontario Regulation 562
- g. Ontario Human Rights Code, 1990
- h. [CLGS Complaints and Feedback Policy 2014-10.pdf](#) ²



Acknowledgement and Agreement

I, _____ (Employee Name), acknowledge that I have read and understand the Accessible Customer Service Policy of CLGS. I undertake and agree to adhere to this policy and will ensure that employees working under my direction adhere to this Policy. I understand that if I violate the rules set forth in this Policy, I may face disciplinary action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____