

ACTRA

AODA INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) CUSTOMER SERVICE POLICY

Policy Section Name	Policy Category	Policy Number
Administration	Accessibility	HR-ADM-01
Organization Scope	Effective Date	Next Review Date
ACTRA National	December 2011	June 2022
Authority (Title)	Owner (Title)	
National Executive Director	Manager, Human Resources & Operations	
Required Reviewers		
Senior Director, Finance & ITDS	Director, Collective Bargaining, People & Operations	

PURPOSE

The purpose of this policy is to develop and break down barriers and increase accessibility for persons with disabilities in organizations that provide goods or services either directly to the public or to other organizations.

SCOPE

This policy is directed towards all those who are employed by ACTRA National and for all members of the public who use our programs and services.

POLICY

All goods and services provided by ACTRA National will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the Customer Service Standards included in the Integrated Accessibility Standards Regulation under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

POLICY STATEMENT

AODA was enacted to ensure goods and services provided are accessible to people with disabilities, and that persons with disabilities are treated with respect, dignity and have equitable access.

ACTRA National is committed to the principles of independence, dignity, integration, and equality of opportunity for persons with disabilities.

ACTRA National will, at all times, strive to provide our services in a way that respects the dignity and independence of persons with disabilities.

ACTRA National is committed to providing service excellence and that everyone should be treated with courtesy and made to feel welcome, and their needs respected. ACTRA National's commitment to our employees, members and the public is to ensure our programs and services are delivered in a way that reflects our vision of respect, strength and unity.

All employees, contractors and other associated parties will communicate with people with disabilities in ways that take into account their disability.

POLICY DETAIL

A disability can be of different severities and can be visible or non-visible. Disabilities can have effects that may come and go.

In accordance with the Customer Service Standards, this policy addresses the following:

- The Provision of Goods and Services to Persons with Disabilities.
- The Use of Assistive Devices.
- The Use of Guide Dogs, Service Animals and Service Dogs.
- The Use of Support Persons.
- Notice of Service Disruptions.
- Customer Feedback.
- Training.
- Notice of Availability and Format of Required Documents.

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, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

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 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: 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: A service animal for a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability as a result of visual indicators, such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
 - College of Audiologists and Speech-Language Pathologists of Ontario.
 - College of Chiropractors of Ontario.
 - College of Nurses of Ontario.
 - College of Occupational Therapists of Ontario.
 - College of Optometrists of Ontario.
 - College of Physicians and Surgeons of Ontario.
 - College of Physiotherapists of Ontario.
 - College of Psychologists of Ontario; or
 - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support person: In relation to a person with a disability, another person who accompanies them to help with communication, mobility, personal care, medical needs, or access to goods and services.

ROLES AND RESPONSIBILITIES

ACTRA National will ensure:

- All employees will be trained on how to provide accessible customer service.
- All employees, contractors and volunteers who provide service at our location will serve individuals with disabilities who are accompanied by a service animal.
- All employees and contractors will welcome and serve people with disabilities who are accompanied by a support person and work with the support person to provide access to our services.

STANDARDS AND PROCEDURES

The Provision of Goods and Services to Persons with Disabilities

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

- Ensuring 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 health and safety risk.
- Using alternative methods, when possible, to ensure customers with disabilities have access to the same services, in the same place and in a similar manner.
- Taking into account individual accommodation needs when providing goods and services; and

- Communicating in a manner that takes into account the customer's disability.

The Use of Assistive Devices

Customer/Visitors' Own Assistive Devices:

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the company.

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank might involve ensuring the customer is in a location that would be considered safe for both the customer and business.

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

The Use of Guide Dogs and Service Animals

A customer with a disability who is accompanied by a guide dog or service animal 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 or service animals.

Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

Recognizing a Guide Dog or Service Animal:

If it is not readily apparent the animal is being used by the customer for reasons relating to their disability, ACTRA National may request verification from the customer/visitor.

Care and Control of the Animal:

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

Allergies and Other Health and Safety Concerns:

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, ACTRA National will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company/Visitor's obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyse all options for safely accommodating the service animal. Options could include creating distance between the two individuals to

eliminate in-person contact or changing the time each of the two individuals receive service to accommodate the use of one individual's service animal on the premises.

In very exceptional circumstances where a service animal causes a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

The Use of Support Persons

If a customer/visitor with a disability is accompanied by a support person, ACTRA National will ensure both persons may enter the premises together and the customer/visitor is not prevented from having access to the support person.

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

In situations where confidential information might be discussed, consent will be obtained from the customer/visitor before any potentially confidential information is mentioned.

Notice of Service Disruptions

ACTRA National will provide notice in the event of a planned or unexpected disruption to the facilities or services accessed by people with disabilities, i.e., elevators (via the building landlord). This notice will include information about the reason for the disruption, the anticipated duration and the description(s) of alternate facilities or services if available. If required, a list of self-identified persons with disabilities will be kept and all reasonable efforts will be made to contact each person individually and inform them of the disruption. A notice of disruption will be posted to the organization's website and a voicemail message recorded on the main office telephone line number.

Customer Feedback

ACTRA National shall provide customers/visitors with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers/visitors and notice of the process will be made available by way of this policy. Feedback forms along with alternate methods of providing feedback, such as verbally (in person or by telephone) or written (handwritten, delivered, website or E-mail), will be available upon request.

Customers/visitors can submit feedback to:

Manager, Human Resources and Operations
ACTRA National
625 Church Street, Suite 300, Toronto, ON. M4Y 2G1
416-489-1311
E-mail Address: humanresources@actra.ca

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

The Manager, Human Resources and Operations or designate will prepare and ensure training is delivered to all employees and volunteers regarding AODA Customer Service Standards according to their needs/duties.

Training will be provided during the on-boarding of new employees, as well as once per year and/or on an ongoing basis, whenever changes are made to relevant policies, procedures, practices, standards, and amendments to the Act.

Training will include:

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- A review of the requirements of the Customer Service Standards;
- 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 or other service animal; or
 - Require the use of a support person (including the handling of admission fees).
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

Notice of Availability and Format of Required Documents

ACTRA National shall notify customers/visitors the documents related to the Customer Service Standards are available upon request and in a format that takes into account the customer's/visitor's disability. Notification will be given by posting the information in a conspicuous place operated by ACTRA National, the ACTRA website (www.actra.ca) and/or any other reasonable method.

RESOURCES

Policies:

HR-ADM-03 – Integrated Accessibility Standards Regulation (IASR) Employment Policy

HR-ADM-05 – Integrated Accessibility Standards Regulation (IASR) Information and Communications Policy

HR-ADM-07 – Employment Standards Policy – Ontario

HR-OHS-03 – Emergency Response Plan

ADMINISTRATIVE PROCESS

If you have any questions or concerns about this policy or its related procedures, please contact:

Manager, Human Resources and Operations
ACTRA National
625 Church Street, Suite 300, Toronto ON. M4Y 2G1
416-489-1311
E-mail Address: humanresources@actra.ca

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