**AODA - Integrated Accessibility Standards Regulation (IASR) Customer Service Policy**

***Note: This policy is current to the July 1, 2016 changes to accessibility legislation.**

## 1. INTENT

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

ECOH understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law. ECOH is committed to complying with both the Ontario Human Rights Code and the AODA.

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

## 2. DEFINITIONS

Customers-refers to all Clients and or Visitors to ECOH.

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.

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 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 – an animal is 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 one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
   - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
   - A member of the College of Chiropractors of Ontario;
   - A member of the College of Nurses of Ontario;
   - A member of the College of Occupational Therapists of Ontario;
   - A member of the College of Optometrists of Ontario;
   - A member of the College of Physicians and Surgeons of Ontario;
   - A member of the College of Physiotherapists of Ontario;
   - A member of the College of Psychologists of Ontario; or
   - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

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 – 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.

## 3. GUIDELINES

In accordance with the Customer Service Standards, 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

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

ECOH shall 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. The Use of Assistive Devices

Customers Own Assistive Device(s)

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

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures shall be used to ensure the 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 business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service shall be provided in a location that meets the needs of the customer.

## C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog shall 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.

Food Service Areas

A customer with a disability that is accompanied by guide dog or service dog shall 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) ECOH shall 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 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, ECOH may request verification from the customer.

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 time.

Allergies

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

**D. The Use of Support Persons**

If a customer with a disability is accompanied by a support person, ECOH shall 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.

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

In situations where confidential information might be discussed, consent shall be obtained from the customer, prior to any conversation where confidential information might be discussed.

Admission Fees

Where ECOH requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, ECOH shall not charge the support persons any fees or fares.

**E. Notice of Disruptions in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of ECOH. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use ECOH's goods or services, reasonable

efforts shall be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications shall include:

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

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur ECOH shall 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 ECOH website;
- contacting customers with appointments;
- verbally notifying customers when they are making an appointment; or
- by any other method that may be reasonable under the circumstances.

**F. Customer Feedback**

ECOH shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process shall be readily available to all customers and notice of the process shall be made available by posting on the ECOH web site and in a conspicuous place in premises operated by ECOH. 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), shall be available upon request.

Submitting Feedback

Customers can submit feedback to:

Patricia Cavallari, Vice President, Human Resources
905-795-2800 extension: 2248
75 Courtneypark Drive West Unit 1, Mississauga, ON L5W 0E3
pcavallari@ecoh.ca

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any ECOH employee.

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

**G. Training**

Training shall be provided to:

- Every person who is an employee of, or a volunteer with, ECOH.
- Every person who participates in developing ECOH's policies.
- Every other person who provides goods, services or facilities on behalf of ECOH.

Training Provisions

Regardless of the format, training shall 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, 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.
- Instructions on what to do when a person provides customer service feedback.
- ECOH's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

ECOH shall provide training as soon as practicable. Training shall be provided to new employees and volunteers during orientation. Revised training shall be provided in the event of changes to legislation, procedures, policies, and/or practices.

**H. Notice of Availability and Format of Documents**

ECOH shall notify customers that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the customer's disability. Notification shall be given by posting the information in a conspicuous place in premises owned or operated by ECOH and on the ECOH website.

## 4. ADMINISTRATION

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

Patricia Cavallari, Vice President, Human Resources
905-795-2800 extension: 2248
75 Courtneypark Drive West Unit 1, Mississauga, ON L5W 0E3
pcavallari@ecoh.ca

This policy and its related procedures shall be reviewed as required in the event of legislative changes, or changes to company procedures.