



## **ACCESSIBLE CUSTOMER SERVICE POLICY**

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*, 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 the Company shall follow the principles of dignity, independence, integration and equal opportunity.

This policy applies to the provision of goods and services at premises owned and operated by the Company.

This policy applies to employees, volunteers who deal with the public or other third parties that act on behalf of the Company, including when the provision of goods and services occurs off the premises of the Company.

This policy shall also apply to all persons who participate in the development of the Company's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

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

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*.

The Company 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.

**Assistive Devices**

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

An 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.

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 the access of goods and services.

**Guide Dogs, Service Animals and Service Dogs**

A customer with a disability that is accompanied by 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.

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*.

**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, the Company 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**

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 times.

**Allergies**

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

**Support Persons**

A support person, in relation to a person with a disability, is defined as, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

If a customer with a disability is accompanied by a support person, the Company 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.

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

### **Notice of Disruptions in Service**

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

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

When disruptions occur the Company 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;
- notifying tenants and requesting that they contact their own customers with appointments;
- by any other method that may be reasonable under the circumstances.

### **Feedback Process**

The Company shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities.

Customers who wish to provide feedback verbally may do so by speaking to any Company employee, or by calling 1-416-366-2000.

Customers who wish to provide formal feedback can do so via the "Contact Us" section of the Company website, or writing to any of our regional offices.

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

### **Training**

Training will be provided to:

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

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 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 what to do if a person with a disability is having difficulty accessing our services.
- the Company's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

The Company will provide training as soon as practicable. Training will be provided to new employees who deal with the public or act on our behalf, during orientation.

The Company 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**

The Company shall notify customers that documents related to the *Accessibility Standard for Customer Service* are available upon request.