

Policies and Procedures

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

POLICY:

In fulfilling its mission, Superior Greenstone Association for Community Living (SGACL or the "Agency") strives at all times to provide its services in a way that respects the dignity and independence of people with a disability. We are committed to equitable treatment and the same opportunity of access to all of our services in the same locations and in a similar way as these services are available to all others we serve, without discrimination, in accordance with the provisions of the Ontario *Human Rights Code*.

SGACL is committed to excellence in providing services to people with a disability and to the continual improvement of accessibility and the ongoing removal of barriers in order to provide greater accessibility for all.

PURPOSE:

The purpose of this policy is to ensure our employees, volunteers, board members, students, and any other member of our organization are trained and are familiar with various assistive devices.

To develop, implement, and enforce accessibility standards in order to achieve accessibility for people with a disability with respect to supports and services.

To communicate the Agency's expectation for upholding the principles of Independence, Dignity, Integration and Equal Opportunity through our work environments.

To ensure compliance with relevant legislation.

OUR COMMITMENT:

SGACL will make all reasonable efforts to ensure that all policies, procedures and practices are consistent with the principles of Independence, Dignity, Integration and Equal Opportunity to all when providing our services to a person with a disability. Any policy of SGACL that does not respect and promote the dignity and independence of people with a disability will be modified or removed.

We are committed to the following four core principles:

- **Dignity** – Service is provided in a way that empowers the person with a disability to maintain self-respect and the respect of other people.
- **Independence** –Teaching the necessary skills so that things can be done without support.
- **Integration** –Same services, in the same place, and in the same or similar way as everyone else, unless an alternate measure is necessary to enable the person to access supports or services.
- **Equal Opportunity** – The opportunity to participate as desired.

SCOPE:

This policy has been developed in accordance with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Ontario Regulation, O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS.

All legislated changes impacting this policy will be reflected in SGACL's policy through updates on an ongoing basis. The policy will be reviewed annually in accordance with applicable legislation. No changes will be made to this policy before considering the impact on people with disabilities.

This policy applies to all employees, volunteers, board members, students, and any other member of SGACL.

DEFINITIONS:

1. "Persons with Disabilities" are people who have a disability as defined under the *Ontario Human Rights Code*.
2. A "Customer" is any person who accesses the services of SGACL.
3. An "Assistive Device" is any device used by people with disabilities to help with daily living. Assistive devices include a range of products such as wheelchairs, walkers, white canes, oxygen tanks, hearing aids, electronic communication devices.
4. A "Service Animal" is an animal that is being used because of a person's disability and this is either readily apparent or is supported by a letter from a medical professional, or regulated health professional.
5. A "Guide Dog" is a dog trained as a guide for a blind person and has the qualifications prescribed by the regulations of the *Blind Persons' Rights Act*.
6. A "Support Person" is a person who assists or interprets for a person with a disability in order to help with communication, mobility, personal care, medical needs or as they

access the services of the agency. A support person is distinct from an SGACL employee who supports the person within the Agency.

7. A "Third Party Contractor" is any person or organization acting on behalf of or as an agent of the agency.
8. "Barriers to Accessibility" means anything that prevents a person with a disability from fully participating in all aspects of society, including the services of the agency. This includes but is not limited to: a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier.
9. An "Accommodation" is a means, through reasonable efforts, of preventing and removing barriers that impede people with a disability from participating fully in the services of the agency.
10. "Premises" includes the buildings, land or grounds where our services are provided.

PROCEDURE:

1. All staff and volunteers shall communicate in ways that take into account a person's disability and shall offer communication methods that are suitable to their communication needs (i.e., email, telephone, in-person, etc.).
2. All staff and volunteers shall provide services that respect the dignity of people, which may include incorporating measures such as the use of assistive devices and service animals.
 - SGACL will ensure that all employees and volunteers will be trained on, and are familiar with, various assistive devices that may be used while accessing our services.
 - Service animals are welcomed in all areas of the premises that are open to the public and to other third parties. All employees and volunteers will be trained on how to interact with each service animal.
3. A person who is accompanied by a support person will be able to have that person accompany them on our premises in areas that are open to the public or third parties. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises.
4. SGACL will provide training for designated staff, volunteers or others who work with the public or other third parties on SGACL's behalf, on how to interact and communicate with people with various types of disabilities. Such training will be provided to designated new staff as a component of their initial orientation and training program. Refresher training will be completed every two (2) years.

5. SGACL will make available to the public, its policies and procedures related to the *Accessibility for Ontarians with Disabilities Act, 2005* and will ensure there is capacity to provide communication about these policies and procedures in a format that takes into account a person's disability.
6. When services are temporarily unavailable, such as access to an elevator, a disruption of service notice will be posted at the site. The notice will include the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.
7. All agency staff involved in the selection and purchase of new equipment or systems or planning a new initiative of the agency, shall take into account this policy.
8. SGACL shall ensure the effectiveness of implementation of the Accessible Customer Service Standard, through development of a process to receive and respond to feedback. No changes will be made to this policy before considering the impact on people with a disability.
 - Feedback on experiences with or concerns about accessibility of services can be made to the Executive Director:
 - On our website at www.sgacl.ca.
 - By phone at (807) 633-2300.
 - By email at sheila.zappitelli@sgacl.ca.
 - The Executive Director shall review all feedback and will respond within seven (7) days from the day the feedback was received, and in the same method the feedback was provided.
9. Questions and inquiries about this policy are welcome and may be directed to any member of the management team. Responses to questions/inquiries shall be provided within seven (7) days.

APPENDICES:

The following appendices will set out the agency's specific procedures for carrying out job functions and responsibilities in meeting the requirements of the Customer Service Standard:

A – Communication and Assistive Devices

B – Use of Support Persons and Service Animals

C – Notice of Temporary Disruption, including Notice Template

D – Training

E – Feedback Process

RECOMMENDED BY: Administration

APPENDICES: 5

ORIGINAL POLICY DATE: December 1, 2011

AUTHORIZED BY: Executive Director

SIGNATURE: *Szappitelli*

DATE: *January 9/24*

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

COMMUNICATION AND ASSISTIVE DEVICES

COMMUNICATION

Communication with people with a disability shall occur in ways that take into account their disability and communication needs.

SGACL shall train designated staff and volunteers who interact with members of the public on communicating with people with various types of disabilities.

Telephone Services:

SGACL is committed to providing fully accessible telephone services to the people we serve, and training staff and volunteers (as applicable) to communicate over the telephone in clear and plain language.

We will offer to communicate with people by all other available means (ie: video conference, TTY, relay services) if telephone communication is not suitable to their communication needs or if it is not available.

To make a call using the Relay System

Phone the number (1-800-855-0511), and tell the operator your name, the name of the person you are calling, and the number you wish to reach.

The operator will make the call for you, and you speak to the operator as if you were talking directly to the person you are calling. For example, say “Hi, How are you doing?” do not say “Tell him I said hello”. Remember to say “Go Ahead” when you finish speaking, so the person on the other end will know it is their turn to speak.

If you normally speak very quickly, the operator may ask you to speak slower so your message can be typed. There will be brief silences as the operator types to the TTY user and the user replies.

ASSISTIVE DEVICES

SGACL welcomes and is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that our staff are trained and are familiar with various assistive devices that may be used by people with disabilities while accessing our services.

SGACL's website indicates that we provide services that respect the independence and dignity of people with disabilities and offer services that include the use of assistive devices.

The Main office located at 206 Hogarth Avenue West, Geraldton, which is open to the public, will post information in the front office/reception area that welcomes the use of assistive devices and encourages users to seek support from staff and volunteers as they require it.

Examples of Assistive Devices may include:

- Telephones with large numbers, amplifiers;
- Wheelchairs;
- Scooters;
- Walkers;
- Amplification devices that boost sound for listeners who are hard-of-hearing without reducing background noise;
- Hearing aids;
- Oxygen tanks;
- Electronic notebooks or laptop computers;
- Personal data managers;
- Communication boards used to communicate using symbols, words or pictures; or
- Speech-generating devices that "speak" when a symbol, word or picture is pressed.

Moving personal assistive devices

- If you have permission to move a person in a wheelchair, remember to:

- Wait for and follow the person's instructions;
 - Confirm that the person is ready to move;
 - Describe what you are going to do before you do it;
 - Avoid uneven ground and objects that create a bumpy and unsafe ride; and
 - Practice consideration and safety – do not leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.
- Do not move items or equipment, such as canes and walkers, out of the users' reach.
 - Respect personal space. Do not lean over a person with a disability or lean on their assistive device.
 - Let the person know about accessible features in the immediate environment (automatic doors, accessible washrooms, etc.).

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ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

USE OF SUPPORT SERVICES AND SERVICE ANIMALS

USE OF SUPPORT PERSON

We are committed to welcoming people with a disability who are accompanied by a support person. Any person with a disability who is accompanied by a support person is able to enter any of SGACL's premises with their support person and they shall have full access to their support person while on any of our premises. At no time will services ever be restricted or fees charged a person with a disability if accompanied by a support person.

USE OF SERVICE ANIMALS

We are committed to welcoming people with a disability who are accompanied by a service animal on parts of our premises that are open to the public and other third parties. This requirement applies only to those areas of the premises where the public or third parties customarily have access and does not include places or areas of the agency where the public does not have access. We will ensure that our staff and volunteers are properly trained in how to interact with people who are accompanied by a service animal.

Examples of service animals include dogs used by people who have vision loss, hearing alert animals for people who are deaf, deafened, or hard of hearing, and animals trained to alert to an oncoming seizure. The customer service standard's provisions also apply to animals providing other services to people with a disability.

It is "readily apparent" that an animal is a service animal when it is obvious by its appearance or by what it is doing. For example, it may be readily apparent that an animal is a service animal if it is wearing a harness, saddle bags, a sign that identifies it as a service animal or has a certificate or identification card from a service animal training school or an identification card from the Attorney General of Ontario. It may also be readily apparent if a person is using the animal to assist them in doing things, such as opening doors or retrieving items.

Exclusion of Service Animal

A service animal can only be excluded from access to the premises where this is required by another law. Examples include the Health Protection and Promotion Act and the Food Safety and Quality Act. The former Act prohibits service animals in places where food is

prepared, processed, or handled (e.g., culinary arts classroom) although service dogs are permitted where food is served and sold (e.g. restaurant).

Where there is a risk to the health and safety of another person as a result of the presence of a service animal, consideration must be given to options available prior to exclusion of a service animal. An example would be a situation where a person has a severe allergy to the service animal. It is SGACL's expectation that the situation be fully analyzed and all measures to eliminate the risk be considered, e.g., creating distance between the two people concerned, making reasonable alterations to schedules, etc.

A service animal can be excluded if it is of a breed that is prohibited by law. An example would be the Ontario Dog Owners' Liability Act which places restrictions on pit bull terriers.

Alternative measures if a Service Animal must be excluded

In the rare instance where a service animal must be excluded, SGACL must make every effort to put alternative arrangements in place to provide the services required by the person with a disability. This could involve leaving the animal in a secure area where it is permitted by law and discussing with the person how best to serve them, e.g., a person with a vision disability might need someone (a member of staff or volunteer) to guide them.

When it is necessary to confirm an animal is a Service Animal

Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, an SGACL staff member may ask the person using the service animal for a letter from a medical professional or regulated health professional confirming that the animal is needed because of a disability. The letter does not need to identify the disability, why the animal is needed or how it is used. Where the person using the service animal regularly attends at the office open to the public, a Support Services Supervisor may request to keep a copy of the letter on file but only as long as required by the circumstances. Alternatively, the person using the service animal may be asked to bring a letter with them on occasions when they visit the premises. The Support Services Supervisor shall preserve the confidentiality of the letter and information contained in the letter and shall not use or disclose the letter or information except as provided for in the Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, cM56, or as otherwise required by law.

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

NOTICE OF TEMPORARY DISRUPTION

SGACL will provide people with notice in the event of a planned or unexpected disruption in the office or of services usually used by people with disabilities.

A notice of disruption will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. Such notice will be placed at the public entrance to our office location and in the reception area.

Any Management staff having knowledge of a planned or unexpected disruption shall ensure that the Notice of Disruption in Services is posted forthwith. Other options for notice may be used and would include: posting a notice on the agency website, and through direct communication with support staff and people supported.

Examples of areas of disruption may include, but are not limited to: accessible washrooms, elevator, parking lot, sidewalk, grab bars, lighting, access to office building.

Example of Notices of Disruption:

Type of Disruption: Office Building Closed

Reason for Disruption: Holiday

Duration of Disruption: December 24, 2022, to January 3, 2023

Alternative Facilities: As arranged, on a case by case basis

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TRAINING

SGACL will provide training to all employees, volunteers and others who work with the public or other third parties on their behalf.

All staff who regularly work out of the Hogarth and Red Rock offices, including all Support Services Supervisors, shall receive training. Further, training will be provided to all new designated staff within one month of hire.

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standard.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people who use an assistive device or require the assistance of a service animal or a support person.
- How to use the assistive devices that the employer may have on the premises or that a person with a disability may use and require assistance with.
- What to do if a person with a disability is having difficulty in accessing SGACL's services.
- SGACL's policies, practices and procedures relating to the Customer Service Standard.

NOTE: Staff will receive additional training when changes are made to policies, practices and procedures related to the Customer Service Standard.

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FEEDBACK PROCESS

The ultimate goal of SGACL is to meet and surpass expectations while serving people with a disability. Feedback on accessible service and how well we are meeting such expectations is welcome and appreciated.

Feedback on experiences with or concerns about accessibility of services can be made to the Executive Director:

- On our website at www.sgacl.ca.
- By phone at (807) 633-2300.
- By email at sheila.zappitelli@sgacl.ca.

The Executive Director shall review all feedback and will respond within twenty-one (21) days from the day the feedback was received, and in the same method the feedback was provided.