

SECTION: HUMAN RESOURCES
NUMBER/TOPIC: HR 2 – EMPLOYMENT STANDARDS
POLICY TITLE: HR 2.14 - ACCESSIBILITY STANDARDS FOR
CUSTOMER/CLIENT SERVICE

POLICY STATEMENT

ESS is committed to meeting its current and ongoing obligations under the Ontario *Human Rights Code* respecting non-discrimination.

ESS understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) 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.

ESS is committed to complying with both the Ontario *Human Rights Code* and the AODA.

ESS is committed to excellence in serving all customers/clients including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

This policy addresses the following:

- The provision of programs and services to persons with disabilities;
- The use of assistive devices by persons with disabilities;
- The use of service animals by persons with disabilities;
- The use of support persons by persons with disabilities;
- Notice of temporary disruptions in services and facilities;
- Staff training;
- Customer/client feedback regarding the provision of goods and services to persons with disabilities;
- Notice of availability and format of documents and meetings;
- Multi-year accessibility planning;
- Procuring or Acquiring Goods and Services;
- Designing Public Spaces; and
- Policy and Procedures.

MODIFICATIONS TO THIS OR OTHER POLICIES

Any policies of ESS that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed.

QUESTIONS ABOUT THIS POLICY

This policy exists to achieve service excellence to customers/clients with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation

should be provided by, or referred to the CEO at ESS.

MULTI-YEAR ACCESSIBILITY PLAN

ESS will establish, implement, maintain, and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. ESS will post its accessibility plans on their website, and provide the plan in an accessible format upon request. ESS will review and update its accessibility plan once every five (5) years.

PROCURING OR ACQUIRING GOODS AND SERVICES

ESS will incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities. The only exception is in cases where it is impractical to do so.

DESIGNING PUBLIC SPACES

ESS will incorporate accessibility criteria and features in the design of any of its public spaces, i.e. service counters and waiting areas.

POLICIES AND PROCEDURES

All program specific procedural and practice manuals will either contain procedures on how to address possible barriers to people with disabilities or will reference the Employee Policies and Procedures Manual.

APPLICATION

This Policy applies to all members of ESS. ESS members include employees, volunteers, students, members of ad hoc committees, contractors, service providers, visitors, guests, or persons who have no ongoing connection to ESS but are on one of our program sites.

DEFINITIONS (from AODA)

Disability: Shall mean,

- a. 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, including diabetes mellitus, epilepsy, and any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, or physical reliance on a guide dog or on a wheel chair or other remedial appliance or device;
- b. a condition of mental impairment or developmental disability;
- c. a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d. a mental disorder; or
- e. an injury or disability for which benefits were claimed or received under the *Workplace Safety and Insurance Act*. Disability may be temporary (i.e. broken leg) or permanent in nature.

Accessible shall mean capable of being entered or reached, approachable, easy to get at, capable of being influenced, obtainable, able to be understood or appreciated.

Assistive Device shall mean a device used to assist persons with disabilities in carrying out

activities or in accessing the services of persons or organizations covered by the Customer/Client Service Standard.

Dignity shall mean respecting and treating every person including persons with a disability as valued and as deserving of effective and full service as any other customer/client.

Independence shall mean freedom from control or influence of others, freedom to make your own choices.

Guide Dog shall mean a dog trained as a guide for a person who is blind and having the qualifications prescribed by the regulations.

Goods and Services shall mean goods, programs and services provided by ESS.

Service Animals shall mean animals that are being used for reasons related to a person's disability or if the person provides a letter from a physician or nurse confirming that the animal is required for reasons relating to the disability.

Support Person shall mean an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs, or with access to goods, programs or services.

PROCEDURES

1. STAFF TRAINING

- a. ESS will provide AODA customer/client service training to:
 - i. All employees and volunteers;
 - ii. Anyone involved in developing our policies; and
 - iii. Anyone who provides goods, services or facilities to customers on our behalf.
- b. This training will be provided as a condition of employment to all new staff and on an ongoing basis to ensure all staff remain current with any policy or procedural change as it relates to the AODA Customer/Client Service Standard.
- c. Training is available in multiple, accessible formats including, but not limited to, face-to-face classroom instruction, online training module, and other formats as requested.
- d. The training will include:
 - The purposes of AODA 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 with disabilities who use an assistive device or require the assistance of a service animal or a support person.
 - How to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.
 - What to do if a person with a disability is having difficulty accessing goods, programs and services at ESS.
 - Current policies, practices, and procedures relating to the customer service standard.

- e. Records will be kept indicating the date and training provided and the number of individuals to whom it was provided.
- f. Staff will also be trained when changes are made to our accessible customer service standard policies.

2. COMMUNICATION AND AVAILABILITY OF DOCUMENTS

ESS is committed to communicating with persons with disabilities in ways that take into consideration their disability. To ensure this:

- a. All staff noted in paragraph (1)(a) above will be trained in how to interact and communicate with persons with disabilities guided by ESS principles of dignity, respect, independence, and equality;
- b. When providing any documentation to a person with a disability, ESS shall do so in a manner and a format that takes into account the person's disability;
- c. Persons with disabilities will be offered alternative communication formats that will meet their needs promptly;
- d. If the communication offered is not suitable for a person's needs, alternative forms of communication will be offered as required and available.

ESS will notify the public that documents related to accessible customer service, are available upon request by posting a notice in the following location(s)/way(s):

- On the Agency's website,
- In all Agency job posting,
- In all Agency surveys, and
- In all Agency brochures.

ESS will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

3. USE OF SERVICE ANIMALS, ASSISTIVE DEVICES, AND SUPPORT PERSONS

ESS will ensure that the access, use, and benefit of programs, goods, or services are not compromised for persons with disabilities who require assistive devices, or who are accompanied by a service animal, guide dog, or support person.

3.1 Service Animals

Service animals, such as, but not limited to Guide dogs, Hearing dogs, Seizure Response dogs, and other certified service animals shall be permitted entry to all ESS facilities and meeting rooms that are open to the public unless excluded by law.

When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their

disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- 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
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services, or facilities:

- Explain why the animal is excluded; and
- Discuss with the customer/client another way of providing goods, services, or facilities.

Service animals are prohibited from the following areas:

- Areas where food is being prepared (Ontario Regulation 562 under the *Health Protection and Promotion Act*).

3.2 Assistive Devices

Persons with disabilities shall be permitted to obtain, use or benefit from programs, goods, or services through the use of their own assistive devices.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services, or facilities.

We will ensure that our employees are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services, or facilities.

3.3 Support Persons

ESS is committed to welcoming persons with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter ESS premises with his or her support person. The support person is to be permitted access to ESS programs and services at no charge when there is a regular fee.

In certain cases, ESS might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- The person with a disability; or
- Others on the premises.

Before making a decision, ESS will:

- Consult with the person with a disability to understand their needs;
- Consider health or safety reasons based on available evidence; and
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

4. NOTICE OF TEMPORARY DISRUPTION TO FACILITIES OR SERVICES

In the event that a planned temporary service disruption occurs that would limit a person with a disability from gaining access to ESS facilities, goods, programs, or services, ESS will make the disruption known to customer/clients in the following ways:

- a. Notice of the service disruption will be posted in the area where the service disruption is located; and
- b. Messages will be posted on the ESS web site at www.esssupportservices.ca.

Notices will include information about the reason for the disruption, its anticipated duration, alternate service locations if applicable, and a description of alternative facilities or services if available.

5. FEEDBACK PROCESS

Comments and feedback how well ESS provides programs and services to people with disabilities are welcome and can be made through:

- The Agency's web site;
- By email (agency@esssupportservices.ca);
- By telephone (416-243-0127);
- In person to any ESS staff at any of our program sites; and
- By feedback card and suggestion box.

Feedback will be directed to the CEO. Customers/clients can expect to hear back in five (5) business days.

ESS will make sure its feedback process is accessible to people with disabilities by providing and arranging for accessible formats and communication supports on request.

CONTACT

For further information, contact the CEO.