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| AODA-INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) CUSTOMER SERVICE POLICY | Document Type: OPERATIONAL POLICY |
| | Effective Date: July 2011 |
| | Last Date Reviewed: May 2022 |
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| | Policy# 3.2.41 |

1.0 Purpose

The Davenport-Perth Neighbourhood and Community Health Centre (DPNCHC) **Accessible Customer Service 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 services to the public or other third parties.

All services provided by Davenport-Perth Neighbourhood and Community Health Centre (“DPNCHC”) shall follow the principles of dignity, independence, integration, and equal opportunity.

2.0 Revision History

| Date | Change |
|---------------|---|
| December 2011 | Protocol was created, Reviewed & Board Approved |
| January 2017 | Reviewed & Approved by Policy Committee |
| February 2017 | Reviewed & Board Approved |
| February 2021 | Reviewed & Approved by Policy Committee |
| March 2021 | Reviewed & Board Approved |
| May 2022 | Reviewed & Approved by Policy Committee & Board |

3.0 Persons Affected

- This policy applies to the provision of services at all locations operated by DPNCHC or where DPNCHC may offer services.
- This policy applies to employees, volunteers, agents, and/or contractors who deal with the public or other third parties that act on behalf of DPNCHC, including when the provision of services occurs off the premises of DPNCHC.
- The section of this policy that addresses the use of guide dogs, service animals, and service dogs only applies to the provision of services that take place at premises where DPNCHC operates or offers services.
- This policy shall also apply to all persons who participate in the development of the DPNCHC’s policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

4.0 Definitions

- Davenport-Perth Neighbourhood and Community Health Centre** is also referred to as DPNCHC, or the Centre.
- Customer** – refers to clients, participants and staff.
- 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, a walker or a personal oxygen

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

4.04 **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*.

4.05 **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.

4.06 **Service Animal** – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- It is readily apparent that the animal is used by the person for reasons relating to their disability; or
- If the person provides a letter from any of the following: a physician, nurse, psychologist, psychotherapist, mental health therapist, audiologist, chiropractor/or occupational therapist, optometrist and physiotherapist, confirming that the person requires the animal for reasons relating to the disability.

4.07 **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; as a result of visual indicators such as the vest or harness worn by the animal or the person who requires the dog can provide on request a letter from any of the following: a physician, nurse, psychologist, psychotherapist, mental health therapist, audiologist or speech-language pathologist, chiropractor/or occupational therapist, optometrist and physiotherapist confirming that the person requires a service dog.

4.08 **Support Person** – as reflected in *Ontario Regulation 429/07*, 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.

4.09 **Accessibility Standards:** Ontario Regulation 429/07 created under the *Accessibility for Ontarians with Disabilities Act 2005 (AODA)* which provides for standards to enhance the accessibility of an organization.

5.0 **Policy**

5.01 In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, 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

DPNCHC 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 accommodation needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Clients' own assistive device(s): Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by DPNCHC.

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, 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 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 will be provided in a location that meets the needs of the customer.

- **Assistive devices provided by DPNCHC:** Assistive devices are available on a first come, first served basis and upon request.

C. 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. 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.
- 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 only permitted into areas where food is served, sold, or offered for sale due to the Health Protection and Promotion Act, Ontario Regulation 493/17

Exclusion Guidelines: If a guide dog, service animal or service dog is excluded by law (see applicable laws below), DPNCHC will offer alternative methods to enable the person with a disability to access services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws:

Food Safety and Quality Act, 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. An exception is made for service dogs to allow them in those areas of a meat plant where food is served, sold, or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling, or storing of animals or parts of animals.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this legislation or of a regulation under this or any other act relating to banned breeds (such as pit bulls) 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. Staff will respectfully explain that the service animal must be removed from the public area due to a municipal by-law and make alternate arrangements or provide the service outside the public area.

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 their disability, DPNCHC may request verification from the customer.

Verification may include:

- A letter from a physician, nurse, psychologist, psychotherapist, mental health therapist, audiologist or speech-language pathologist, chiropractor/or occupational therapist, optometrist and physiotherapist, 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 time.

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, DPNCHC will make all reasonable efforts to meet the needs of all individuals. Pursuant to the agency'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, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing 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.

D. Support Persons

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

Fees: If payment is required by a support person for activities carried on by DPNCHC, the organization will ensure that notice is given in advance by posting notice of admission fees for support persons in a highly conspicuous location.

Where there is a legitimate health and safety concern if the customer is unaccompanied and where there are no reasonable alternatives available, the support person will be required to accompany the customer with a disability. DPNCHC will waive any applicable admission fees for the support person.

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 DPNCHC. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use DPNCHC's 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.

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

- Services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration
- A description of alternative services or options

Notifications Options: When disruptions occur DPNCHC 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 and/or on the DPNCHC website.
- Contacting clients with appointments or those who regularly attend a planned activity.
- Verbally notifying customers when they are making a reservation or appointment.
- By any other method that may be reasonable under the circumstances.

F. Feedback Process

DPNCHC shall provide clients with the opportunity to provide feedback on the service provided to clients with disabilities. Information about the feedback process will be readily available to all clients and notice of the process will be made available by notice on DPNCHC's website and by program staff. 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), will be available upon request.

Submitting Feedback:

Clients can submit feedback to:
Kim Fraser, Executive Director

Davenport-Perth Neighbourhood and Community Health Centre
1900 Davenport Road
Toronto, Ontario M6N 1B7
(416) 656-8025 ext. 229, kfraser@dpnchc.ca

Clients who wish to provide feedback by completing an onsite client feedback form or verbally can do so to any DPNCHC employee. Clients who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training (See also Training Policy 3.2.42)

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of DPNCHC; for example, consultants who provide training or workshops to participants/clients
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions: As reflected in Ontario Regulation 429/07, 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 Accessibility Standards for Customer Service;
- 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 our services
- DPNCHC's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule: DPNCHC will provide training as soon as it is practicable. Training will be provided to new employees, volunteers, agents and/or contractors regardless of their interaction with the public or act on our behalf, such as during new staff orientation. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

- Training will be delivered through the online HRdownloads Training Systems, specifically designed for this purpose.
- For those who have completed the training on the Accessibility for Ontarians with Disabilities Act, 2005 and the 5 AODA standards, they may sign the Self-Declaration form attached to this policy. This applies to all DPNCHC's employees, volunteers, students, contracted service providers and agents.

Record of Training: DPNCHC will keep a record of training that includes the person's name, training dates and the training completed.

H. Notice of Availability and Format of Documents

DPNCHC shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by DPNCHC, the DPNCHC's website and/or any other reasonable method.

Administration

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

Kim Fraser, Executive Director
Davenport-Perth Neighbourhood and Community Health Centre
1900 Davenport Road, Toronto, Ontario
M6N 1B7
P: (416) 656-8025, ext. 229
E: kfraser@dpnchc.ca

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

6.0 Cross References:

Also see:

3.2.42 Accessibility for Ontarians with Disabilities Training Policy

3.2.45 Employment Policy

3.2.46 **AODA-Integrated Accessibility Standards Regulation (IASR)** - Information and Communications Policy

AODA-Integrated Accessibility Standards Regulation (IASR)

Accessible Customer Service Declaration Form

I, _____, as a _____
(print name) (Staff/Board member, student, volunteer, contracted service provider, agent)

declare that I have completed the on-line training on _____, 20__ and that I have received, read and understand the contents and expectations as outlined in the Davenport-Perth Neighbourhood and Community Health Centre's Accessible Customer Service Policy.

By signing below, I do hereby declare that I understand and agree to abide by the contents and expectations as outlined in the training.

Sign

Date

Witnessed by:

Date