

Accessibility for Ontarians with Disabilities Act (AODA)

Customer Service Standards Policy, Procedures and Practices

Background

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was passed by the Ontario legislature with the goal of creating standards to improve accessibility across the province.

The AODA allows the government to develop specific standards of accessibility that are designed to help make Ontario more accessible.

One of the specific standards that has been developed, and made law, is the Accessible Customer Service Standard. This standard details specific requirements for all service providers.

In general, providers must deliver service in a way that preserves the dignity and independence of people with disabilities. Providers must also integrate services and equal opportunity.

The accessibility standards for customer service apply after January 1, 2012.

Requirements under the AODA, regulation 429/07

1. Establish policies, practices and procedures on providing goods or services to people with disabilities.
2. Set a policy on allowing people to use their own personal assistive devices to access goods and services, and about any other measures offered (assistive devices, services, or methods) to enable them to access goods and services.
3. Use reasonable efforts to ensure that policies, practices and procedures are consistent with the core principles of independence, dignity, integration and equality of opportunity.
4. Communicate with a person with a disability in a manner that takes into account his or her disability.
5. Train staff, volunteers, contractors and any other people who interact with the public or other third parties on our behalf.

6. Train staff, volunteers, contractors and any other people who are involved in developing our policies, practices and procedures on the provision of goods or services.
7. Allow people with disabilities to be accompanied by their guide dog or service animal in those areas of the premises that are open to the public, unless the animal is excluded by another law. If a service animal is excluded by law, use other measures to provide services to the person with a disability.
8. Permit people with disabilities who use a support person to bring that person with them while accessing goods or services on our premises.
9. Where admission fees are charged, provide notice ahead of time on what admission, if any, would be charged for a support person of a person with a disability.
10. Provide notice when facilities or services that people with disabilities rely on to access or use goods or services are temporarily disrupted.
11. Establish a process for people to provide feedback on how we provide goods or services to people with disabilities and how we will respond to any feedback and take action on any complaints. Make the information about our feedback process readily available to the public.

Purpose

The purpose of this Customer Service Standards Policy is to fulfill the requirements set out in regulation 429/07 to establish a policy for the Ontario Association of Children's Aid Societies (OACAS) for governing the provision of its goods or services to persons with disabilities.

This Policy Shall:

1. Provide a statement from OACAS regarding our commitment to compliance with the AODA regulation 429/07.
2. Determine the application of this Policy.
3. Provide definitions for use within this Policy.
4. Provide documentation of this Policy.
5. Determine responsibilities for review and amendments.
6. Provide information regarding customer feedback.
7. Provide information regarding Service Animals, and Support Persons.

8. Identify policy and procedures regarding advance notice of admission fees.
9. Identify policy and procedures regarding notice of any service disruption.
10. Identify policy and procedures regarding notice of any unexpected disruption in service.
11. Determine employee training requirements in relation to this Policy.
12. Use acceptable terminology when talking about disabilities.
13. Provide best practices and procedures for providing accessible customer service.
14. Provide links for more information regarding this Policy.
15. Discuss the repercussions associated with any non-compliance to this Policy.

1. OACAS' Statement

OACAS shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- The goods or services will be provided in a manner that respects the dignity and independence of persons with disabilities
- The provision of goods or services to persons with disabilities, and others, will be integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services
- Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services
- Persons with disabilities may use assistive devices and/or support persons in the access of goods and services
- Employees, when communicating with a person with a disability, shall do so in a manner that takes into account the person's disability

2. Application of Policy

This policy shall apply to every person who deals with members of the public or other third parties on behalf of OACAS, whether the person does so as an employee, contractor, agent, volunteer or otherwise.

3. Definitions

Accessibility Coordinator - The person appointed by OACAS as Accessibility Coordinator.

Assistive Devices - Any auxiliary aid such as communication aids, cognition aids, personal mobility aids and medical aids (i.e. canes, crutches, wheelchairs, or hearing aids).

Disabilities - The same as definition of disability found in the Ontario Human Rights Code:

- 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, 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.
- b. A condition of mental impairment or a 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.
- e. An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Employees - Any person who deals with members of the public or other third parties on behalf of OACAS, whether the person does so as an employee, agent, volunteer or otherwise.

Persons with Disabilities - Individuals that are afflicted with a disability as defined under the Ontario Human Rights Code.

Service Animals - Any animal individually trained to do work or perform tasks for the benefit of a person with a disability.

Support Persons - Any person whether a paid professional, volunteer, family member or friend that accompanies a person with a disability in order to help with communications, personal care or medical needs or with access to goods or services.

4. Provision of Documentation

OACAS shall, upon request, supply a copy of the policies, practices and procedures required under the Ontario Regulation 429/07 – Accessibility Standards for Customer Service to any person.

5. Review and Amendments

The Accessibility Coordinator (Human Resources Coordinator) shall be responsible for initiating the review process and any subsequent amendments to this policy document. Review and amendments shall take place on an ongoing basis, and at a minimum interval of every two years.

6. Customer Feedback

Feedback from our customers provides OACAS with opportunities to learn and improve. OACAS recognizes the right of our customers to provide feedback and suggestions on ways to improve our services.

To assist OACAS in ensuring that the delivery of goods and service to those with disabilities is provided in an effective and timely manner, the customer is invited to provide their feedback as follows:

In writing, in person, e-mail, or telephone, addressed to Accessibility Coordinator:

Human Resources Coordinator
75 Front Street East, Suite 308
Toronto, ON M5E 1V9
Phone: 416 987-7725; 1 800 718-1797
Fax: 416 366-8317
E-mail: amikhael@oacas.org or

Events Assistant
75 Front Street East, Suite 308
Toronto, ON M5E 1V9
Phone: 416 987-7725; 1 800 718-1797
Fax: 416 366-8317
E-mail: events@oacas.org

The Accessibility Coordinator will respond either in writing, in person, e-mail or telephone acknowledging receipt of feedback and will set out the action to be taken in response to any suggestions to improve service.

7. Service Animals and Support Persons

- OACAS employees shall use reasonable efforts to allow persons with disabilities to use their own assistive devices to access goods and/or services
- OACAS employees shall allow persons with disabilities to be accompanied by their guide dog or service animal unless the animal is excluded by law
- Where an animal is excluded by law from the premises, the reason why the animal is excluded shall be explained to the persons with disabilities, and other reasonable arrangements to provide goods and services shall be explored with the assistance of the person with disability
- When a service animal is unruly or disruptive (jumping on people, biting, or other harmful behaviour) an employee may ask the persons with disability to remove the animal from the area or refuse access to goods or services. In this event, other reasonable arrangements to provide goods or services shall be explored with the assistance of the person with disability
- Persons with disabilities may be accompanied by their support person while accessing goods and/or services. Additional fees for costs may apply.

8. Advance Notice of Additional Fees

In the event that additional fees are charged, advance notice shall be communicated concerning what costs, if any, would be charged for a support person.

9. Notice of Service Disruptions

- It is possible that from time to time there will be disruptions in service (e.g. an entrance way that is under repair, renovations that limit access to an area, or technology that is temporarily unavailable)
- In the event that a disruption in service is planned, and expected, it is important to provide reasonable notice
- In the event of an unexpected disruption in service, notice may be provided in a variety of ways, and will be done as quickly as possible

10. Training Requirements

- Every person who participates in the development of the policy, practices and procedures under Ontario Regulation 429/07 – Accessibility Standards for Customer Service must be trained appropriately in relation to this Policy

- Every person who deals with the public on behalf of OACAS, including third parties i.e. employees, agents, volunteers, management must complete training in relation to this Policy
- New employees, agents, volunteers, management, etc. shall receive training as soon as “practicable”, after being assigned
- Ongoing training on changes to policies, procedures, and new equipment shall be provided
- The method and amount of training shall be geared to the trainee’s role in terms of accessibility
- Training records shall be kept, including the dates when the training is provided, number of individuals to whom the training was provided

11. Acceptable Terms for Use When Talking About Disabilities

The following is an excerpt from the Ministry of Community and Social Services:

[http://www.mcass.gov.on.ca/mcass/english/how/howto_choose.htm]

Words can influence and reinforce the public’s perception of people with disabilities. They can create either a positive view of people with disabilities or an indifferent, negative depiction.

Here are some general tips that can help make your communication and interactions with or about people with all types of disabilities more successful.

- Use *disability* or *disabled*, not *handicap* or *handicapped*
- Never use terms such as *retarded*, *dumb*, *psycho*, *moron* or *crippled*. These words are very demeaning and disrespectful to people with disabilities
- Remember to put people first. It is proper to say *person with a disability*, rather than *disabled person*
- If you don’t know someone or if you are not familiar with the disability, it’s better to wait until the individual describes his/her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and your assumptions may be wrong

12. Best Practices and Procedures for Providing Accessible Customer Service

OACAS has adopted procedures in the pursuit of providing consistently high customer service standards for all clients, regardless of race, creed, age, gender, or disability.

All customer service provided by OACAS shall follow the ideals of dignity, independence, integration and equal opportunity. All employees must follow these procedures.

People with disabilities often have their own way of doing things. Ask before you help.

12.1 Providing Customer Service for Persons with Physical Disabilities

Physical disabilities include a range of functional limitations from minor difficulties in moving or coordinating one part of the body, through muscle weakness, tremors, and paralysis. Physical disabilities can be congenital such as Muscular Dystrophy; or acquired, such as tendonitis. A physical disability may affect an individual's ability to:

- Perform manual tasks such as holding a pen, turning a key or grip a door knob
- Move around independently
- Control the speed or coordination of movements
- Reach, pull or manipulate objects

There are many types and degrees of physical disabilities, and not all require a wheelchair. It may be difficult to identify a person with a physical disability.

- Speak normally and directly to your customer. Don't speak to someone who is with them
- People with physical disabilities often have their own way of doing things. Ask before you help.
- Wheelchairs and other mobility devices are part of a persons' personal space, don't touch, move or lean on them
- Provide your customer information about accessible features of the immediate environment (automatic doors, accessible washrooms, etc.)
- Keep ramps and corridors free of clutter
- If a counter/workspace is too high or wide, step around it to provide service
- Provide seating for those that cannot stand
- Be Patient. Customers will identify their needs to you.

12.2 Providing Customer Service for Persons with Hearing Loss

Hearing loss can cause problems in distinguishing certain frequencies, sounds or words. A person who is deaf or has a hearing impediment may be unable to:

- Use a public telephone
- Understand speech in noisy environments
- Pronounce words clearly enough to be understood by strangers

Like other disabilities, hearing loss has a wide variety of degrees. Customers who are deaf or have a hearing impediment may require assistive devices when communicating.

- Attract the customer's attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand
- Always ask how you can help. Don't shout. Speak clearly
- Be clear and precise when giving directions, and repeat or rephrase if necessary. Make sure you have been understood
- Face the person and keep your hands and other objects away from your face and mouth
- Deaf people may use a sign language interpreter to communicate- always direct your attention to the Deaf person –not the interpreter
- Any personal (e.g. financial) matters should be discussed in a private room to avoid other people overhearing
- If the person uses a hearing aid, try to speak in an area with few competing sounds
- If necessary, write notes back and forth to share information
- Don't touch service animals – they are working and have to pay attention at all times

12.3 Providing Customer Service for Persons with Deaf-Blindness

Deaf-Blindness is a combination of hearing and vision loss. The result for a person who is deaf-blind is significant difficulty accessing information and performing daily activities. Deaf-blindness interferes with communication, learning, orientation and mobility. People who are deaf-blind communicate using various sign language systems, Braille, telephone devices, communication boards and any combination thereof.

Many people who are deaf-blind use the services of an Intervener who relays information and facilitates auditory and visual information and acts as sighted guides.

Most people who are deaf-blind will be accompanied by an intervener, a professional who helps with communicating.

Interveners are trained in special sign language that involves touching the hands of the client in a two-hand, manual alphabet or finger spelling, and may guide and interpret for their client.

- Do not assume what a person can or cannot do. Some people who are deaf-blind have some sight or hearing, while others have neither.
- A customer who is deaf-blind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them
- Do not touch or address the service animals – they are working and have to pay attention at all times
- Never touch a person who is deaf-blind suddenly or without permission unless it's an emergency
- Understand that communication can take some time- be patient.
- Direct your attention to your customer, not the Intervener.

12.4 Providing Customer Service for Persons with Vision Disabilities

Vision disabilities reduce one's ability to see clearly. Very few people are totally blind; many have limited vision such as tunnel vision, where a person has a loss of peripheral or side vision, or a lack of central vision, which means they cannot see straight ahead. Some can see the outline of objects while others can see the direction of light.

Vision loss may result in:

- Difficulty reading or seeing faces
- Difficulty maneuvering in unfamiliar places
- Inability to differentiate colours or distances
- A narrow field of vision
- The need for bright light, or contrast
- Night blindness

Vision disabilities may restrict your customers' abilities to read signs, locate landmarks or see hazards. In some cases, it may be difficult to tell if a person has a vision disability, while others may use a guide dog and/or white cane.

- Verbally identify yourself before making physical contact
- If the person uses a service animal- do not touch or approach the animal- it is working
- Verbally describe the setting, form, location as necessary
- Offer your arm to guide the person. Do not grab or pull
- Never touch your customer without asking permission, unless it is an emergency
- Don't leave your customer in the middle of a room. Show them to a chair, or guide them to a comfortable location
- Don't walk away without saying good-bye

12.5 Providing Customer Service for Persons with Intellectual Disabilities

Intellectual disabilities affect a person's ability to think and reason. It may be caused by genetic factors such as Downs Syndrome, exposure to environmental toxins, Fetal Alcohol Syndrome, brain trauma or psychiatric disorders.

A person with an intellectual disorder may have difficulty with:

- Understanding spoken and written information
- Conceptual information
- Perception of sensory information
- Memory

People with intellectual or developmental disabilities may have difficulty doing many things that most of us take for granted. These disabilities can mildly or profoundly limit one's ability to learn. You may not be able to know that someone has this disability unless you are told, or you notice the way people act, ask questions or use body language.

As much as possible, treat your customers with an intellectual or developmental disability like anyone else. They may understand more than you think, and they will appreciate your treating them with respect.

- Do not assume what a person can or cannot do
- Use clear, simple language
- Be prepared to explain and provide examples regarding information

- Remember that the person is an adult and unless you are informed otherwise, can make their own decisions
- Be patient and verify your understanding
- If you can't understand what is being said, don't pretend. Just ask again
- Provide one piece of information at a time
- Speak directly to your customer, not to their companion or attendant

12.6 Providing Customer Service for Persons with Speech Disabilities

Speech disabilities involve the partial or total loss of the ability to speak. Typical disabilities include problems with:

- Pronunciation
- Pitch and loudness
- Hoarseness or breathiness
- Stuttering or slurring

Some people have problems communicating. It could be the result of cerebral palsy, hearing loss, or another condition that makes it difficult to pronounce words, causes slurring or stuttering, or not being able to express oneself or understand written or spoken language. Some people who have severe difficulties may use communication boards or other assistive devices.

- Where possible, communicate in a quiet environment
- Give the person your full attention. Don't interrupt or finish their sentences
- Ask them to repeat as necessary, or to write their message
- If you are able, ask questions that can be answered 'yes' or 'no'
- Verify your understanding
- Patience, respect and willingness to find a way to communicate are your best tools

12.7 Providing Customer Service for Persons with Learning Disabilities

Learning disabilities include a range of disorders that affect verbal and non-verbal information acquisition, retention, understanding and processing. People with a learning disability may have average or above average intelligence, but take in and process information and express knowledge in different ways.

Learning disabilities may result in difficulties with:

- Reading
- Problem solving
- Time management
- Way finding
- Processing information

Learning disabilities are generally invisible and ability to function varies greatly.

- Respond to any requests for verbal information, assistance in filling in forms, etc. with courtesy
- Allow extra time to complete tasks if necessary

12.8 Providing Customer Service for Persons with Mental Health Disabilities

Mental Health disabilities include a range of disorders; however there are three main types of mental health disorders:

- Anxiety
- Mood
- Behavioural

People with mental health disabilities may seem edgy or irritated, act aggressively, are perceived as pushy or abrupt, be unable to make a decision, start laughing or get angry for no apparent reason.

- Treat each person as an individual. Ask what would make him/her the most comfortable and respect his/her needs to the maximum extent possible.
- Try to reduce stress and anxiety in situations
- Stay calm and courteous, even if the customer exhibits unusual behaviour, focus on the service they need and how you can help

12.9 Providing Customer Service for Persons with Smell Disabilities

Smell disabilities can involve the inability to sense smells or a hypersensitivity to odors and smells. A person with a smelling disability may have allergies to certain odors, scents or chemicals or may be unable to identify dangerous gases, smoke, fumes and spoiled food.

12.10 Providing Customer Service for Persons with Touch/Tactile Disabilities

Touch/ Tactile disabilities can affect a person's ability to sense texture, temperature, vibration or pressure. Touch sensations may be reduced or heightened resulting in a hypersensitivity to touch, temperature, or the opposite, numbness and the inability to feel touch sensations

12.11 Providing Customer Service for Persons with Taste Disabilities

Taste disabilities can limit the experience of the four primary taste sensations; sweet, bitter, salty and sour. A person with a taste disability may be unable to identify spoiled food or noxious substances.

12.12 Providing Customer Service for Persons with Other Disabilities

Other disabilities may result from a range of other conditions, accidents, illnesses and diseases including ALS, asthma, diabetes, cancer, HIV/AIDs, environmental sensitivities, seizure disorders, heart disease, stroke and joint replacement.

Disabilities are not always visible or easy to distinguish.

13. Links for More Information

To review the Accessibility for Ontarians with Disabilities Act, Ontario Regulation 429/07 in its entirety, please visit:

[Ontario Regulation 429/07](#)

For additional information visit the Ministry of Community and Social Services (MCSS) website at:

<http://www.mcsc.gov.on.ca/mcss>

14. Repercussions associated with any Non-Compliance to this Policy

Failure to comply with this policy may result in disciplinary action.