

Accessibility Standards for Customer Service Policy

Intent

The purpose of this Customer Service Standards Policy is to fulfill the requirements set out in regulation 429/07 to establish a policy for MEDA Limited for governing the provision of its goods or services to persons with disabilities.

This Policy Shall:

1. Provide a Statement from MEDA Limited 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. Identify potential Exclusions;
5. Provide MEDA Limited documentation of this Policy;
6. Detail Expectations for Management Employees;
7. Determine Responsibilities for Review and Amendments;
8. Provide information regarding Customer Feedback
9. Provide information regarding Service Animals, and Support Persons;
10. Identify policy and procedures regarding Advance Notice of Admission Fees;
11. Identify policy and procedures regarding Notice of any Service Disruption;
12. Identify policy and procedures regarding Notice of any Unexpected Disruption in Service;
13. Determine employee Training Requirements in relation to this Policy;
14. Provide Acceptable Terms for Use When Talking About Disabilities;
15. Provide Best Practices and Procedures for Providing Accessible Customer Service;
16. Provide links for more information regarding this Policy;
17. Discuss the repercussions associated with any Non-Compliance to this Policy

Statement

MEDA Limited 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.
- MEDA Limited employees when communicating with a person with a disability shall do so in a manner that takes into account the person's disability.

Application

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

Definitions

Accessibility Coordinator - The person appointed by MEDA Limited 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 – As defined by the Ontario Human Rights Code found under the Providing Customer Service section.

Employees - Any person who deals with members of the public or other third parties on behalf of MEDA Limited, 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

Exclusions

This Accessibility Customer Service Standards Policy shall not apply during any period where MEDA Limited has declared a “State of Emergency” as defined under the Emergency Management Act.

Documentation

MEDA Limited 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.

Management Employee Expectations

To implement this policy, management employees shall:

- Establish practices and procedures;
- Evaluate practices and procedures;
- Revise practices and procedures as required.

Review and Amendments

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

Customer Feedback

Feedback from our customers provides MEDA Limited with opportunities to learn and improve. MEDA Limited recognizes the right of our customers to make a complaint, compliment or make suggestions on ways to improve our services.

To assist MEDA Limited 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:

Sheila Gyorgy
1575 Lauzon Rd
Windsor, ON
N8S 3N4
Phone: (519) 944-7221 Ext. 124
Fax: (519) 944-6862
E-mail: sgyorgy@medagroup.com

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 complaints.

Service Animals and Support Persons

- MEDA Limited employees shall use reasonable efforts to allow persons with disabilities to use their own assistive devices to access goods and/or services.
- MEDA Limited 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.

Admission Fees – Advance Notice

In the event that admission fees are charged, advance notice concerning what admission, if any, would be charged to a support person shall be posted in a conspicuous place.

Service Disruption - Notice

- 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.
- People with disabilities may often go to a lot of trouble to access services, such as booking transit or arranging a ride. By providing notice, you can save that person an unnecessary trip.
- Notice will be provided on the website, over the phone, or in writing.

Unexpected Disruption in Service - 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.
- In the event of a service disruption, alternative methods of service may be considered and those impacted by service interruption shall be informed of any alternative methods.

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 MEDA Limited, including 3rd parties i.e. employees, agents, volunteers, management must complete training in relation to this Policy.
- Current employees, agents, volunteers, management, etc. shall receive training by January 1, 2012.
- 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 equipments 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.

Acceptable Terms for Use When Talking About Disabilities

The Following is an excerpt from the Ministry of Community and Social Services
[http://www.mcscs.gov.on.ca/mcscs/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.

Best Practices and Procedures

Accessible Customer Service follows four basic principles:

- Dignity
- Independence
- Integration
- Equal Opportunity
- What can I do to help people with disabilities access our services?
- Ask how you can help
- Offer a variety of methods of communication
- Understand the nature and scope of the service you offer

Providing Customer Service for Persons with Disabilities

Physical – 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
- Have strength or endurance

Best practices and procedures for Customer Service:

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 is too high or wide, step around it to provide service
- Provide seating for those that cannot stand in line
- Be Patient. Customers will identify their needs to you.

Hearing – Hearing loss can cause problems in distinguishing certain frequencies, sounds or words. A person who is deaf, deafened or hard-of hearing may be unable to:

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

Best practices and procedures for Customer Service:

Like other disabilities, hearing loss has a wide variety of degrees. Remember, customers who are deaf or hard of hearing 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

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 relay information and facilitate auditory and visual information and act as sighted guides.

Best practices and procedures for Customer Service:

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.

Vision – 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

Best practices and procedures for Customer Service:

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

Intellectual - 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, such as 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

Best practices and procedures for Customer Service:

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

Speech – 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

Best practices and procedures for Customer Service:

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

Learning - 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.

Best practices and procedures for Customer Service:

- 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.

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

- Anxiety
- Mood
- Behavioral

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

Best practices and procedures for Customer Service:

- 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 behavior, focus on the service they need and how you can help.

Smell – 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.

Touch – 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

Taste - 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.

Other - 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.

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 on and after January 1, 2010 and to other providers of goods or services on and after January 1, 2012.

Requirements under the AODA, regulation 429/07

Organizations Must:

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 your goods and use your services and about any other measures your organization offers (assistive devices, services, or methods) to enable them to access your goods and use your 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 your behalf on a number of topics as outlined in the customer service standard.
6. Train staff, volunteers, contractors and any other people who are involved in developing your policies, practices and procedures on the provision of goods or services on a number of topics as outlined in the customer service standard.
7. Allow people with disabilities to be accompanied by their guide dog or service animal in those areas of the premises you own or operate 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 in premises open to the public or third parties.
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 your goods or services are temporarily disrupted.
11. Establish a process for people to provide feedback on how you provide goods or services to people with disabilities and how you will respond to any feedback and take action on any complaints. Make the information about your feedback process readily available to the public.

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.mcass.gov.on.ca/mcass>

For more information regarding preferred language when dealing with people with disabilities, please visit:

[MCSS: Talk About Disabilities - Choose the Right Word](#)

Non-Compliance

Failure to comply with this policy may result in disciplinary action up to and including termination.