



S.E.N.A.C.A. Seniors Day Program Halton Inc.

Accessible Customer Service Policy

Intent

This 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 goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by S.E.N.A.C.A. shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by S.E.N.A.C.A.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of S.E.N.A.C.A., including when the provision of goods and services occurs off the premises of S.E.N.A.C.A. such as in: delivery services, call centers, vendors, drivers, catering and third party marketing agencies.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by S.E.N.A.C.A.
- d) This policy shall also apply to all persons who participate in the development of S.E.N.A.C.A.'s policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Definitions

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

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



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- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

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.

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 his or her disability; or
- If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

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;
- Or the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

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.

General Principles

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

S.E.N.A.C.A. 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;



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

B. Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by S.E.N.A.C.A.

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. 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 S.E.N.A.C.A.:

The following assistive devices are available on a first come, first serve basis and upon request, to assist customers in accessing our goods and services:

- Wheelchairs
- Raised Seating Platforms
- Walkers
- Walking Canes
- Hearing/Blind Devices as needed

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.

Food Service Areas:

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 not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.



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Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) S.E.N.A.C.A. will offer alternative methods to enable the person with a disability to access goods and 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. It also makes an exception 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.

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act 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.

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 his or her disability, S.E.N.A.C.A. may request verification from the customer.

Verification may include:

- A letter from a physician or nurse 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:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, SENACA will make all reasonable efforts to meet the needs of all individuals.



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D. Support Persons

If a customer with a disability is accompanied by a support person, S.E.N.A.C.A. 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 S.E.N.A.C.A. 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 where confidential information might be discussed.

Admission Fees:

If payment is required by a support person for admission to the premises S.E.N.A.C.A. will ensure that notice is given in advance by posting notice of admission fees for support persons where S.E.N.A.C.A.'s fees are posted.

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 S.E.N.A.C.A. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use S.E.N.A.C.A.'s goods or 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:

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

Notifications Options:

When disruptions occur, S.E.N.A.C.A. 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 S.E.N.A.C.A. website;
- Contacting customers with appointments;
- Verbally notifying customers when they are making a reservation or appointment; or
- By any other method that may be reasonable under the circumstances.



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F. Feedback Process

S.E.N.A.C.A. shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers. 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:

Customers can submit feedback to:

- Wendy McBride, Executive Director
- Phone Number: 905-337-8937
- Mailing Address: 53 Bond Street, Oakville ON, L6K 1L8
- Email Address: wendy@senaca.ca
- Website: www.senaca.ca

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any S.E.N.A.C.A. employee.

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training

Training will be provided to:

- All employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of S.E.N.A.C.A.; for example: salespersons, drivers, vendors, event operators, call centers and third party marketing agents; and,
- 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, Ontario Regulation 429/07*.
- 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 your services.



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- (Business Name)'s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

S.E.N.A.C.A. will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractor who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

S.E.N.A.C.A. will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents

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

Accessibility Training for Staff

Physical Disabilities

- Includes wheelchairs, crutches, walkers and oxygen tanks (regulated by self).

Tips

1. If you need to have a lengthy conversation with someone who uses a wheelchair or scooter, consider sitting so you can make eye contact at the same level.
2. Ensure when in situ wheelchair/walker brakes are on. When standing up or transferring, brakes must be engaged.
3. Don't touch items or equipment such as canes, walkers and wheelchairs without permission.
4. If you have permission to move a person's wheelchair don't leave them in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.

Vision Loss

Vision loss can restrict someone's ability to read locate landmarks or see hazards. Some customers may use a guide dog or a white cane, while others may not. Guide dogs are permitted at all times.

Tips

1. When you know someone has vision loss, don't assume the individual can't see you. Many people who have low vision still have some sight.
2. Identify yourself when you approach and speak directly to the customer.
3. Ask if they would like you to read any printed material out loud to them (i.e. menu)
4. Using "clock" explain where food is placed on plate.
5. When providing directions or instructions be precise and descriptive.
6. Offer your elbow to guide if needed.
7. Work with CNIB and provide Braille materials etc.



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People Who Have Hearing Loss

People who have hearing loss may be deaf, deafened or hard of hearing. They may also be oral deaf – unable to hear, but prefer to talk instead of using sign language. These terms are used to describe different levels of hearing and/or the way a person’s hearing was diminished or lost.

Tips

1. Once a customer has identified themselves as having hearing loss, make sure you are in a well-lit area where they can see your face and read your lips.
2. As needed attract the customer’s attention before speaking try a gentle touch on the shoulder or wave of your hand.
3. If your customer uses a hearing aid, reduce background noise or move to a quieter area. If necessary ask if another method of communicating would be easier. (i.e. pen and paper)

People Who Are Deaf/Blind

A person who is deaf/blind may have some degree of both hearing and vision loss. Many people who are deaf/blind will be accompanied by an intervener, a professional support person who helps with communication.

Tips

1. A customer who is deaf/blind is likely to explain to you how to communicate with them, perhaps with an assistance card or a note.
2. Speak directly to your customer, not the intervener.

People with speech or language impairments

Cerebral palsy, hearing loss, stroke or other conditions may make it difficult for a person to pronounce words or may cause slurring. Some people who have severe difficulties may use a communication board or other assistive devices.

Tips

1. Don’t assume that a person with a speech impairment also has another disability.
2. Whenever possible, ask questions that can be answered with “yes” or a “no”.
3. Be patient. Don’t interrupt or finish your customer’s sentences.

People who have learning disabilities

The term “learning disabilities” refers to a variety of disorders. One example is dyslexia, which affects how a person takes in or retains information. This disability may become apparent when a person has difficulty reading material or understanding the information you are providing.

Tips

1. Be patient – people with some learning disabilities may take a little longer to process information, to understand and to respond.
2. Try to provide information in a way that takes into account the customer’s disability. For example, some people with learning disabilities find written words difficult to understand, while others may have problems with numbers and math.



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People who have intellectual/developmental disabilities

Developmental or intellectual disabilities, such as Down Syndrome, can limit a person's ability to learn, communicate, do everyday physical activities and live independently. You may not know that someone has this disability unless you are told.

Tips

1. Don't make assumptions about what a person can do.
2. Use plain language.
3. Provide one piece of information at a time.
4. Always talk directly to the individual.

People who have mental health disabilities

Mental health issues can affect a person's ability to think clearly, concentrate or remember things. Mental health disability is a broad term for many disorders that can range in severity. For example, some customers may experience anxiety due to hallucinations, mood swings, phobias or panic disorder. Some customers may have dementia/Alzheimer's.

Tips

1. If you sense or know that a customer has a mental health disability, be sure to treat them with the same respect, dignity and consideration you have for everyone else.
2. Be confident, calm and reassuring.
3. If a customer appears to be in a crisis, ask them to tell you the best way to help.
4. Use simple sentences – yes and no answers, one thing at a time – multiple steps can be very confusing.
5. Gentle, soft manner.

How to interact with people who use assistive devices, and how to use any equipment that your organization provides to help customers with disabilities

An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities, such as moving, communicating or lifting. Personal assistive devices can include things like wheelchairs, hearing aids, white canes or speech amplification devices.

Tips

1. Don't touch or handle any assistive device without permission.
2. Don't move assistive devices or equipment, such as canes and walkers, out of your customer's reach.
3. Let your customers know about accessible features in the immediate environment that are appropriate to their needs (e.g. public phones with TTY service, accessible washrooms, etc.)

If your organization offers any equipment or devices for customers with disabilities, make sure you know how to use them. It could be helpful to have instruction manuals handy or an instruction sheet posted where the device is located or stored.



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S.E.N.A.C.A. accommodates:

1. Wheelchairs, canes and walkers.
2. Staff trained for customers with mental/physical disabilities.
3. Bars in washrooms.
4. Ramps.

How to interact with a person who has a guide dog or other service animal

People with vision loss may use a guide dog, but there are other types of service animals as well. Hearing alert animals help people who are deaf, deafened, oral deaf, or hard of hearing. Other service animals are trained to alert an individual to an oncoming seizure. Under the standard, service animals must be allowed on the parts of your premises that are open to the public. In some instances, service animals will not be permitted in certain areas by law (for example, a restaurant kitchen).

Tips

1. Remember that a service animal is not a pet. It is a working animal. Avoid touching or addressing them.
2. If you're not sure if the animal is a pet or a service animal, ask your customer.

How to serve a person accompanied by a support person

Some people with disabilities may be accompanied by a support person, such as an intervener. A support person can be a personal support worker, a volunteer, a family member or a friend. A support person might help your customer with a variety of things from communicating, to helping with mobility, personal care or medical needs.

S.E.N.A.C.A. welcomes support people to the workplace or business. They are permitted in any part of our premises and S.E.N.A.C.A. does not charge them an attendance fee.

Tips

1. If you're not sure which person is the customer, take your lead from the person using or requesting your goods or services, or simply ask.
2. N.B. Speak directly to your customer, not to their support person.