



RocheBanyan

**Accessibility for Ontarians with Disabilities
Act 2005 (AODA)**

**Customer Service Standard Policy and
Procedures**

January, 2012

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CUSTOMER SERVICE POLICY, PRACTICES and PROCEDURES on PROVIDING GOODS and SERVICES to PEOPLE with DISABILITIES

1 PREAMBLE

1.1 PURPOSE

This policy and its procedures address the accessibility requirement of Regulation 429/07 Accessibility Standards for Customer Service under the Accessibility for Ontarians with Disabilities Act (AODA) 2005. Its purpose is to ensure that:

- The Company posts a notice in their facilities and on their websites that documents required by the AODA Customer Service Standard are available upon request.
- Persons with disabilities who interact with The Company have communication access that is as effective as that provided to persons without disabilities. The service need not produce the identical result or level of achievement for disabled and non-disabled persons; but, it must afford the person to whom it is provide equal opportunity to achieve equal results, gain equal benefit and reach the same level of achievement.
- Each facility that is open to the public will, as applicable, post information in the front office or reception or entrance that encourages potential users to seek support from staff as they require it.
- Persons with disabilities who are accompanied by a service animal and/or support persons are treated with dignity and respect.
- Persons with disabilities know when there is a temporary disruption of service.
- The Company provides training on the AODA Customer Service Standard to all management, employees and consultants who deal with the public on The Company's behalf.
- The Company also ensures that people who are involved in the development of their policies and procedures have received training on the AODA Customer Service Standard.
- Records are kept to track implementation of the AODA Customer Service Standard, including training records of each manager, employee and consultant.
- A process is implemented for individuals to provide feedback on how The Company provides goods and services to persons with disabilities, and for response to any feedback, including taking action on any complaints/ suggestions, as required by the Accessibility Standards for Customer Service.

1.2 SCOPE

This policy applies to all employees and all facilities in Ontario of, and all interactions with the public by RocheBanyan Inc (The Company).

1.3 RESPONSIBILITY

It is the responsibility of Management to ensure that all employees follow the guidelines set out in this policy. Management is responsible to ensure all employees are trained as required under the AODA Customer Service Standard, and on this policy and procedures.

1.4 DEFINITIONS

Assistive devices are: any devices used by persons with disabilities to help with daily living and tasks. They include, for example, auxiliary aids, communication aids, cognition aids, personal mobility aids and medical aids. Assistive devices include a range of products such as wheelchairs, walkers, white canes, crutches, oxygen tanks, hearing aids and other electronic communication devices.

Disability, as per the *Ontario Human Rights Code*, means:

- 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, and degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, deafness or hearing impairment, 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 a dysfunction in one or more of the processes involved in understanding or using symbol or spoken language;
- A mental disorder;
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*.

Employee means every person who deals with the members of the public, clients, or other third parties on behalf of The Company, whether the person does so as an employee, consultant or otherwise.

Persons with disabilities are individuals who have a disability as defined under the *Ontario Human Rights Code* (and above).

Service animal is an animal that a person with a disability uses for support. Such use is either readily apparent or is supported by a letter from a physician or nurse. Service Animals are animals individually trained to do work or perform tasks for the benefit of the person with a disability.

- It may be readily apparent that an animal is a service animal when its appearance or behaviour (e.g., wearing a harness or saddlebags) identifies it as a service animal or the owner has a certificate or identification card from a service animal training school. It may also be apparent if a person is using the animal to assist him or her, e.g., opening doors or retrieving items.
- Service animals offer independence and security to many people with various disabilities. Some laws generally prohibit animals in certain areas, such as food preparation areas. However, a service animal is permitted in most public situations.

Support Persons are any persons who accompany and/or assist a person with a disability in a variety of ways.

- This includes assisting with communication, personal care or medical needs and access to goods and services and/or serving as an intervener, sign language interpreter, or a personal support worker providing physical assistance.
- The support person could be a paid professional, a volunteer, a friend or a family member.
- He or she does not necessarily need to have special training or qualifications.

2 POLICY

2.1 Principles of: dignity, independence, integration and equal opportunity.

2.1.1. We are committed to strive at all times to provide our goods and services to persons with disabilities in keeping with the principles of: dignity, independence, integration and equal opportunity. We are also committed to allow people with disabilities to benefit from the same services, in the same place and manner and in a similar way as our other customers.

To do so, reasonable efforts will be made to ensure that:

- 2.1.2. Persons with disabilities are provided equal opportunity to obtain, use and benefit from the goods and services of The Company;
- 2.1.3. Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- 2.1.4. The goods and services provided to persons with disabilities are integrated with the provisions to others unless an alternate measure is necessary to allow a person with a disability to benefit; the alternative measure may be temporary or permanent.

2.2 Communications

2.2.1 We are committed to communicating with people with disabilities in respectful ways that take into account their disability. This includes our general communications; communications during transactions related to the provision of our goods and services; over the telephone and while involving people with a disability in consultations and/or in meetings.

2.3 Assistive Devices

2.3.1 We are committed to supporting persons with disabilities to use assistive devices when necessary to access our goods and services.

2.4 Service Animals

- 2.4.1 We are committed to welcoming persons with disabilities who are accompanied by a service animal.
- 2.4.2 We provide a water dish for service animals to use in meeting rooms.

2.5 Support Persons

- 2.5.1 We are committed to welcoming persons with disabilities who are accompanied by a support person.
- 2.5.2 Fees will not be charged for support persons for admission to The Company's premises, seminars or other goods or services.
- 2.5.3 Customers will be informed of this policy by a notice posted on our websites and in person, in writing or by telephone when this information is requested by the customer and/or his or her support person.

2.6 Disruption of Service

- 2.6.1 We are committed to making all reasonable efforts to provide notice and accommodations in the event of a planned or unexpected disruption in the facilities or services where we have control over such facilities or services.

2.7 Training

- 2.7.1 The Company is committed to providing training on the AODA Customer Service Standard to all management, employees and consultants who deal with the public on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.
- 2.7.2 Training will be provided as soon as practical after an individual assumes responsibilities related to the public.
- 2.7.3 The amount and format of the training will be tailored to suit each person's interactions with the public or his/her involvement in the development of policies, procedures or practices pertaining to the provision of goods and services.
- 2.7.4 Management, staff and consultants will also be trained on an ongoing basis when changes are made to these policies or procedures.

2.8 Record Keeping

- 2.8.1 We are committed to keeping records that document our implementation of the AODA Customer Service Standard.
- 2.8.2 The Company will maintain accurate records of training taken by our management, staff and consultants and make these records available for inspection as may be required.
- 2.8.3 Documents required by the Accessibility Standards for Customer Service are available upon request and in compliance with applicable privacy legislation.

2.9 Feedback Processes

- 2.9.1 We are committed to seeking and responding to feedback on the provision of our goods and services to persons with disabilities.
- 2.9.2 We welcome feedback as it encourages continuous improvement in our goods and services and gives us opportunities to learn, improve and acknowledge our performance.
- 2.9.3 Feedback about the delivery of goods and services to persons with disabilities may be given by telephone, in writing, in electronic format or through other methods.
- 2.9.4 We will ensure that all of our Evaluation Forms have a designated area for providing this feedback.

3 PROCEDURES

3.1 Commitment to excellence

The Company is committed to excellence in serving all customers, including customers with disabilities. The following procedures outline the steps we undertake to provide our goods and services in keeping with our policies as outlined above.

3.2 Communication:

Meeting differential needs

- 3.2.1 We will communicate with people with disabilities in ways that take into account the specific needs of each individual, using a variety of different techniques to enhance interaction and provide goods and services effectively to that individual.
- 3.2.2 We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

Using respectful terminology

- 3.2.3 We will be intentional in choosing terminology that is respectful and appropriate. The terminology we use can influence the way we see people and may unintentionally create a negative perception. The words we use can be very powerful. However unintentional, many words used to describe the nature of a disability can be demeaning and disrespectful.
- 3.2.4 All oral and written communications is inclusive of and positive toward people with a disability.
- 3.2.5 We will try to remember to put people first, to say "person with a disability" instead of "disabled person".
- 3.2.6 We avoid terminology that demeans people with disabilities (such as unfit, defective or incapacitated);
- 3.2.7 We avoid words such as "handicapped", "Crippled" and "Wheelchair- bound" or "confined to a wheelchair".
- 3.2.8 We do not refer to people by categories such as "the blind" or "the disabled".

Following communication guidelines

- 3.2.9 To assist people with disabilities access our goods and service, employees should utilize the following guidelines:
 - Treat people with disabilities with the same respect and consideration you offer everyone else.

- If you are not sure what to do, ask the individual, “May I help you?”
- Ask before you offer help: don’t just jump in. People often have their own way of doing things. Individuals with disabilities know if they need help and how you can provide it.
- If you don’t know someone, or if you are unfamiliar with disability, it’s better to wait until the individual describes his or her situation to you, rather than make your own assumptions. Many types of disabilities have similar characteristics and your assumptions may be wrong.
- Some disabilities are not visible. Take the time to get to know the individuals’ needs.
- Speak normally, clearly and directly. Speak directly to a person with a disability, not to their interpreter or someone who is with them.
- Be patient; give the individual time to explain him or herself.

Providing alternatives to telephone

- 3.2.10 We will offer to communicate with customers by email or text messaging if telephone communication is not suitable to their communication needs or is not available. If TTY is required, we will use the Bell Relay Service (1-800-855-0511); (http://www.bell.ca/Accessibility_services/Bell_Relay_service#1).

Holding inclusive meetings & seminars

- 3.2.11 We will give careful consideration to whether consultations, meetings, and transaction methods are inclusive of people with disabilities.
- 3.2.12 When organizing meetings and seminars, we will make attempts to use facilities that cater for people with disabilities: e.g., ramps, handrails and lifts for people with mobility disabilities, access to toilets; inductive loop or radio systems to assist people with hearing impairments; sufficient lighting in the room; etc.
- 3.2.13 We welcome interpreters and other support persons to assist persons with disabilities attending meetings and seminars. Fees will not be charged for support persons.

Providing alternate formats

- 3.2.14 When preparing materials intended to be distributed to the public, customers and clients, we will consider the format of the material and its accessibility to the target audience.
- 3.2.15 We provide all our meeting documentation in accessible formats when these are requested.
- 3.2.16 We will consider whether alternative formats are required to facilitate access by a person with a disability.
- 3.2.17 We will target materials to the audience carefully to avoid excessive cost.

- 3.2.18 We will explore different options for making accessible formats available including:
- Distributing standard formats, and developing and providing alternative formats only upon request
 - Providing a pamphlet or booklet in accessible format, and supplementary documents upon request.
- 3.2.19 Management will be aware of the availability of alternative formats, and particular formats The Company is willing to provide upon request.
- 3.2.20 The Company will provide the following alternative formats upon request:
- Internet: The internet is a highly suitable medium for many people with hearing, vision, mobility and manipulatory impairments. To make the publication most compatible to software that assists persons with disabilities, documents will be posted on our website in HTML format.
 - Electronic format: Providing information in a electronic format may be suitable for people with hearing, visions, mobility and/or manipulatory impairments. We will convert publications to HTML format to make them most compatible with accessibility software.
 - Large and illustrated print: Large print is targeted mainly to people with low vision. It refers to any printed matter that uses a font that is 14 point or larger. Illustrated print is designed to provide a quick visual outline of a message. It is often preferred by people with an intellectual disability, people with some vision impairments and can also assist people from culturally and linguistically diverse backgrounds. The Company will provide large print on an as needs basis upon request, and will explore the availability of illustrative print upon request.
 - Easy English: This format is useful if providing information specifically to people with intellectual disabilities or limited reading skills. The information is summarized and expressed in short sentences that each conveys a single idea or concept. The Company's materials are prepared in straightforward language. Upon request, explanations about materials provided will be given in Plain Language.
- 3.2.21 The Company will provide information about events and services in a variety of media, e.g., website, print materials, and information provided over the telephone or by fax and email.
- 3.2.22 The Company will ensure that all facilities have clear signs that include internationally recognized symbols and indicators.

3.3 Assistive Devices

- 3.3.1 The Company's websites will indicate that all facilities that provide goods and services respect the independence and dignity of

- persons with disabilities and offer services that include the use of assistive devices.
- 3.3.2 Each of the Company's facilities that is open to the public will post information in the front office/reception area or entrance that The Company welcomes the use of assistive devices and encourages users to seek support from staff as they require it.
 - 3.3.3 Employees will not touch or move a person's assistive device without the person's permission and/or move the device out of the person's reach.
 - 3.3.4 Employees will practice consideration and safety, and will not leave a person with a disability in an awkward, dangerous, or undignified position such as facing a wall or in the path of opening doors.
 - 3.3.5 Employees will let people with disabilities know about the availability of accessible features in the immediate environment such as automatic doors, accessible washrooms or change rooms. If not available, alternatives will need to be determined and communicated to those requiring them (i.e. assistance to open a door will be provided).

3.4 Use of service animals

- 3.4.1 We are committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties.
- 3.4.2 We will also ensure that management, staff and consultants dealing with the public, our clients and seminar participants are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

3.5 Use of support persons

- 3.5.1 A person with a disability who is accompanied by a support person will be welcomed on the premises and at any events of The Company.
- 3.5.2 At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.
- 3.5.3 Access will be in accordance with normal security procedures.
- 3.5.4 All employees will remember to direct all communications directly to the person with a disability not to their support person.
- 3.5.5 In some cases, a support person may have to agree to rules or requirements that are specific to the kinds of goods or services provided. For example, where confidentiality is important because of the kind of information discussed, we may require the support person to sign a confidentiality agreement prior to the disclosure of

information. A copy of the signed consent form will be retained at The Company's offices.

- 3.5.6 In this event, consent of disclosure will first be obtained from the person with a disability prior to discussing or releasing confidential personal information in the presence of the support person.
- 3.5.7 If the person with a disability uses a different support person for a subsequent meeting, a new signed consent will be required.

3.6 Notice of temporary disruption

Planned or unexpected disruption in service

- 3.6.1 We will provide notice to customers with disabilities in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities.
- 3.6.2 If a disruption in service is planned and expected, we will provide notice as far in advance of the disruption as possible so that persons with disabilities will have adequate time to plan and make alternative arrangements.
- 3.6.3 We will provide notice by posting information in visible places on our premises or on The Company's websites, or by any other method that may be reasonable under the circumstances.
- 3.6.4 If a disruption is unexpected, we will provide notice as soon as possible after the disruption has been identified.
- 3.6.5 Generally, disruptions such as during a power outage do not require special notice. However, if the disruption has a significant impact on people with disabilities, we will provide the notice of disruption in an appropriate manner as soon as possible.
- 3.6.6 From time to time we may not have direct control over facilities or services. In these circumstances, we will work with the organization that does have control over the facility/service in order to ensure a notice of temporary disruption is posted.
- 3.6.7 The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternate facilities, services or alternative mechanisms to access the goods/services.
- 3.6.8 The Employees are responsible for the safe evacuation of people with disabilities during emergencies.

Location of Notice

- 3.6.9 Where possible, clients with disabilities will be contacted by telephone and given information about alternative arrangements.
- 3.6.10 A notice also will be placed at all public entrances and service counters on our premises, on voicemail, and on The Company's websites.
- 3.6.11 Depending on the nature of the disruption, notice will be given by posting the information at a conspicuous place (e.g., on or directly

to the side of an elevator door or washroom door) or in The Company's facilities or venue area.

3.7 Training of staff

Compulsory training

- 3.7.1 The Company will provide compulsory training to all management, planners, employees and consultants who deal with the public, clients or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures, including course directors, management and consultants delivering courses and seminars.
- 3.7.2 This training will be provided on a regular basis as part of training for all new staff and consultants, within their first month of employment and commencement of their duties.
- 3.7.3 All managers, staff and consultants will be trained on an on-going basis when changes are made to these policies or procedures.

Content of training

- 3.7.4 Training will include the following:
 - The purpose of the *Accessibility for Ontarians with Disabilities Act* and the requirements of the Customer Service Standard
 - Information regarding The Company's policies and procedures relating to the Customer Service Standards, (e.g., customer service, assistive devices, communication, service animals, support persons, disruption of service, feedback processes, etc.)
 - How to interact and communicate with people with various types of disabilities
 - What to do if a person with a particular type of disability is having difficulty accessing our goods and services
 - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person
 - How to use any equipment or devices that The Company may purchase over time to assist staff or customers with disabilities or otherwise that may help with the provision of goods or services to people with disabilities

3.8 Record keeping

- 3.8.1 We will keep a record of all training provided on the AODA Customer Service Standard, as required by the customer service regulation under the AODA and Regulation 429/07.
- 3.8.2 A record will also be kept of when and how the training was done for each employee, along with their test scores.

- 3.8.3 A notification of the availability of documentation is on The Company's websites and posted in our offices.
- 3.8.4 Information about these records will be made available upon request.
- 3.8.5 In determining a suitable format, The Company will work with the person with a disability to ensure that the documentation or information provided is in a format that meets their disability-specific needs.
- 3.8.6 Any information released will be in compliance with applicable privacy legislation.

3.9 Feedback process

- 3.9.1 The Company will meet and surpass the customer service expectation while serving customers with disabilities.
- 3.9.2 Comments on our services regarding how well those expectations are being met are welcome and appreciated.
- 3.9.3 Feedback regarding the way The Company provides goods and services to people with disabilities can be made by email, verbally, in the allocated space on the evaluation forms for seminars and courses, and on the Feedback Form posted on our website.
- 3.9.4 Information can be communicated to The Company via telephone, email, mail, verbally in person or any other means that accommodates a person with a disability effectively.
- 3.9.5 If an individual indicates that he or she would like a response, The Company will address the comment/suggestion in a timely fashion. In some cases, comments may be very specific to one situation. In other cases, comments may be broader and provide an opportunity for enhancing The Company's policies or practices.
- 3.9.6 Upon receipt of any complaints, the Management will investigate the matter with the appropriate personnel and provide a written response within fifteen (15) days.
- 3.9.7 All feedback received will be recorded by The Company, and action taken to ensure that all persons with disabilities are treated with the utmost dignity and respect and their needs accommodated.

4 MODIFICATION TO THIS OR OTHER POLICIES

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any existing policies of The Company that do not respect and promote the dignity and independence of people with disabilities will be modified or removed.

5 QUESTIONS ABOUT THIS POLICY

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of the policy is not understood, an explanation should be provided by, or refer to the Management of The Company.

A copy of this policy is available upon request by contacting the Management of The Company. The Policy document will be provided, when requested, in a format that takes into account the person's disability. In addition, a copy of this policy is available on The Company's websites at: www.rochebanyan.ca

6 REFERENCES:

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07.