

ACCESSIBLE CUSTOMER SERVICE POLICY

General Administration

PURPOSE

The *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) is a provincial act with the purpose of developing, implementing, and enforcing accessibility standards in order to achieve accessibility for persons with disabilities, with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Under the AODA, the Ontario Regulation 429/07 entitled *Accessibility Standards for Customer Service* came into force on January 1, 2008. That regulation establishes accessibility standards specific to customer service for public sector organizations, and other persons or organizations that provide goods and services to members of the public or other third parties.

This policy is created in accordance with the *Accessibility Standards for Customer Service* (Ontario Regulation 429/07) and addresses the following:

- the provision of goods and services to persons with disabilities;
- the use of assistive devices by persons with disabilities;
- the use of service animals by persons with disabilities;
- the use of support persons by persons with disabilities;
- notice of temporary disruptions in services and facilities;
- training;
- customer feedback regarding the provision of goods and services to persons with disabilities; and
- notice of availability and format of documents.

SCOPE

This policy applies to all persons who deal with tenants, members of the public, or other third parties on behalf of London & Middlesex Housing Corporation (LMHC), whether the person does so as an employee, board director, agent, volunteer, student on placement, or otherwise, and all persons who participate in developing LMHC’s policies, practices and procedures governing the provision of goods and services to tenants, members of the public or other third parties.

DEFINITIONS

Assistive device means a device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Customer Service Standard.

Disability is defined as:

- (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 requires the use of 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;

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- (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*.

Guide dog is defined in section 1 of the *Blind Persons' Rights Act* as a dog trained as a guide for a blind person and having qualifications prescribed by the regulations under the *Blind Persons' Rights Act*.

Nurse means a Registered Nurse or Registered Practical Nurse who is a registered member in good standing with the College of Nurses of Ontario.

Physician means someone who is a registered member, in good standing, with the College of Physicians and Surgeons of Ontario.

Service animal means any animal used by a person with a disability for reasons relating to the disability, where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or where the person provides a letter from a physician or nurse confirming that he or she requires the animal for reasons relating to his or her disability; or 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.

Support person is a person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to goods or services.

POLICY STATEMENT

The London & Middlesex Housing Corporation is committed to providing quality goods and services that are accessible to all the persons that we serve.

GENERAL PRINCIPLES

A. The Provision of Goods and Services to Persons with Disabilities

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

- LMHC's goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- the provision of LMHC's goods and services to persons with disabilities are integrated with those provided to persons who do not have disabilities, unless an alternative measure is necessary to enable a person with a disability to obtain, use or benefit from LMHC's goods or services and,
- persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from LMHC's goods and services.

B. Communication with Persons with Disabilities

When communicating with a person with a disability, LMHC will do so in a manner that takes into account the person's disability.

C. Notice of Temporary Disruption in Services and Facilities

LMHC is aware that the operation of its services and facilities is important to its tenants. However, temporary disruptions in LMHC's services and facilities may occur due to reasons that may or may not be within LMHC's control or knowledge.

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LMHC will make reasonable effort to provide notice of the disruption to its tenants, including information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, available. LMHC will make reasonable effort to provide prior notice of planned disruption if possible, recognizing that in some circumstances such as in the situation of unplanned temporary disruption, advance notice will not be possible. In such cases, LMHC will provide notice as soon as possible.

When temporary disruption occurs to LMHC's services or facilities, LMHC will provide notice by posting the information in visible places or our Dundas Street office (located at 379 Dundas Street, suite 207), on the LMHC website (www.london-housing.ca), or by any other method that may be reasonable under the circumstances, as soon as reasonably possible.

D. Assistive Devices and other Measures that Assist with Accessibility

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from LMHC's goods and services. Exceptions may occur in situations where LMHC has determined that an assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises.

In these situations and others, LMHC may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from LMHC's goods and services, where LMHC has such other measures available.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

E. Service Animals

Persons with a disability may enter premises owned and operated by LMHC accompanied by a service animal, and keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, LMHC will ensure that alternate means are available to enable the person with a disability to obtain, use, or benefit from LMHC's goods and services.

If it is not readily apparent that the animal is a service animal, LMHC may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability. LMHC may also, or instead, ask for 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.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

F. Support Persons

A person with a disability may enter premises owned and operated by LMHC with a support person, and have access to the support person while on the premises.

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LMHC may require a person with a disability to be accompanied by a support person while on LMHC premises in situations where it is necessary to protect the health or safety of the person with a disability, or the health and safety of others on the premises.

A support person, when assisting a person with a disability to obtain, use or benefit from LMHC's goods and services, will be permitted to attend at no charge as admission fees are not applicable.

G. Feedback

LMHC is committed to providing high quality goods and services to all tenants and members of the public it serves. Feedback from the tenants and public is welcomed as it may identify areas that require change, and encourage continuous service improvements.

Feedback from a tenant or member of the public about the delivery of services to persons with disabilities may be given by telephone, in person, in writing, in electronic format or through other methods.

Information about the feedback process will be readily available to the public and tenants, and notice of process will be posted on LMHC's website (www.london-housing.ca) and at our main office, located at 379 Dundas Street, suite 207.

H. Training

LMHC will ensure that all persons to whom this policy applies receive training as required by the *Accessibility Standards for Customer Service*. The amount and format of training given will be tailored to suit each person's interactions with the public, and his or her involvement in the development of policies, procedures and practices pertaining to the provision of goods and services.

The content of the training will include:

- a review of the purposes of the AODA;
- the requirements of the *Accessibility Standards for Customer Service* (Ontario Regulation 429/07);
- instruction on LMHC's policies, procedures and practices pertaining to the provision of goods and services to persons with disabilities;
- how to interact and communicate with persons with various types of disabilities;
- what to do if a person with a particular type of disability is having difficulty accessing LMHC's goods and services;
- how to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal;
- information about the equipment or devices available on LMHC's premises that may help with the provision of services to persons with disabilities.

Timeline for Training

Training will be provided as soon as practicable upon an individual being assigned the applicable duties, as well as on an ongoing basis as changes occur to LMHC's policies, procedures and practices governing the provision of services to persons with disabilities.

Records of Training

LMHC will keep records of the training, including the date on which training is provided, and the number of individuals to whom it is provided. The names of individuals trained

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will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA).

AVAILABILITY AND FORMAT OF DOCUMENTS REQUIRED BY THE ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE (ONTARIO REGULATION 429/07)

All documents required by the *Accessibility Standards for Customer Service*, including LMHC's Accessible Customer Service policies, procedures and practices, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to MFIPPA and the *Personal Information Protection and Electronic Documents Act* (PIPEDA).

When providing a document to a person with a disability, LMHC will provide the document, or the information contained in the document, in a format that takes the person's disability into account.

NOTICE OF THE AVAILABILITY OF DOCUMENTS

Notice of the availability of all documents required by the *Accessibility Standards for Customer Service* will be posted on our website and at the office (located at 379 Dundas Street, suite 207).

INQUIRIES

For any questions or inquiries regarding the *Accessible Customer Service Policy*, visit our website at www.london-housing.ca, or contact the Development Coordinator.

LEGISLATION

- *Accessibility for Ontarians with Disabilities Act*
www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm
- *Accessibility Standards for Customer Service*
www.e-laws.gov.on.ca/html/regs/english/elaws_regs_070429_e.htm

RELATED DOCUMENTS

- Feedback Form
- Feedback & Monitoring Procedure
- Service Animals – Procedures
- Use of Support Persons
- Training for AODA Customer Service Standard
- Use of Assistive Devices
- Business Continuity Plan
- Clear Writing Procedures

DOCUMENT CONTROL

Approved: October 27, 2011

Revised: