

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

## **Integrated Accessibility Standards Regulation (IASR) Customer Service Policy Handbook**

*Last Revised: 2021-03-19 (KJ)*

### **Intent**

This policy is intended to meet the requirements of the Customer Service Standards included in the Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005*. It 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 Markham Property Services Ltd. (MPS Property Services) shall follow the principles of dignity, independence, integration and equal opportunity.

### **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
- 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 – an animal is a service animal for a person with a disability if:

1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or

2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
- A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
  - A member of the College of Chiropractors of Ontario;
  - A member of the College of Nurses of Ontario;
  - A member of the College of Occupational Therapists of Ontario;
  - A member of the College of Optometrists of Ontario;
  - A member of the College of Physicians and Surgeons of Ontario;
  - A member of the College of Physiotherapists of Ontario;
  - A member of the College of Psychologists of Ontario; or
  - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

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 – 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.

## Guidelines

In accordance with the Customer Service Standards, 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**

MPS Property Services 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;
- 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.

These guidelines will give you tips on how best to interact with a person with a disability, so that you can provide excellent customer service to all MPS Ltd. customers.

When interacting with a person with a disability, remember the **T.A.L.K.** principle:

**T** = Take the time to ask "May I help you?"

**A** = Ask – don't assume. Never assist unless asked

**L** = Listen attentively and speak directly to the customer

**K** = Know the accommodations and special services that are available

If you notice that a person is having difficulty accessing our services, a good starting point is to simply ask how you can best help. Be patient, and remember that our customers are your best source of information about their needs. The solution can be simple and they will likely appreciate your attention and consideration.

### **How to interact and communicate with people with various types of disabilities**

Being able to interact and communicate with people with disabilities is a big part of providing accessible customer service. Sometimes the best approach is to ask a person with a disability how you can best communicate with them. Here are some tips:

#### **People who are deafblind**

A person who is deafblind may have some degree of both hearing and vision loss. Many people who are deafblind will be accompanied by a support person who helps with communication.

- Speak directly to the customer, not to the support person
- A customer who is deafblind is likely to explain to you how to communicate with them, perhaps with the assistance card or note

#### **People who have hearing loss**

people who have hearing loss may be Deaf, oral deaf, deafened or hard of hearing. These terms are used to describe different levels of hearing and/or the way a person's hearing was diminished or lost.

- Attract the customer's attention before speaking. Try a gentle touch on the shoulder or wave of your hand
- Make sure you are in a well-lit area where the customer can see your face and read your lips
- If the customer uses a hearing aid, reduce background noise or move to a quieter area
- If necessary, ask if another method of communication would be easier (for example, using a pen and paper)

### **People who have physical disabilities**

There are many types and degrees of physical disabilities. Only some people with physical disabilities use a wheelchair. Someone with a spinal cord injury may use crutches while someone with severe arthritis or a heart condition may have difficulty walking longer distances.

- If you need to have a lengthy conversation with someone who uses a wheelchair or scooter, consider sitting so that you can make eye contact at the same level
- Don't touch items or equipment, such as canes or wheelchairs without permission
- 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

### **People who have 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.

- Don't assume that the customer can't see you – many people who have low vision still have some sight
- Identify yourself when you approach the customer and speak directly to them
- Ask your customer if they would like you to read any printed material out loud to them
- When providing directions or instructions, be precise and descriptive
- Offer your elbow to guide them if needed

### **People who have learning disabilities**

The term "learning disabilities" refers to a variety of disorders, such as dyslexia, that affect 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.

- Be patient – people with some learning disabilities may take a little longer to process information, to understand and to respond
- 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

### **People with speech or language impairments**

Cerebral palsy, hearing loss 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.

- Don't assume that a person with a speech impediment has another disability
- Whenever possible, ask questions that can be answered with `yes` or `no`
- Be patient. Don't interrupt or finish the customer's sentences

### **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.

- Treat a person with a mental health disability with the same respect and consideration you have for everyone else
- Be confident, calm and reassuring
- If a customer appears to be in crisis, ask them to tell you the best way to help

### **People who have intellectual or 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.

- Don't make assumptions about what a person can do
- Use plain language
- Provide one piece of information at a time

### **How to interact with people who use assistive devices**

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.

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

### **How to interact with people with disabilities who require the assistance of 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 accessible customer service standard, service animals are allowed on the



parts of the premises that are open to the public or to other third parties, unless the animal is otherwise excluded by law. You may ask a person for a letter from a physician or nurse verifying that their animal is required for reasons relating to their disability if it is not readily apparent.

- Remember that a service animal is not a pet – it is a working animal
- Avoid touching or addressing service animals – they are working and have to pay attention at all times
- Avoid making assumptions about the animal. If you are not sure if the animal is a pet or service animal, ask the customer

### **How to interact with people with disabilities who require the assistance of 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 the customer with a variety of things from communicating, to helping with mobility, personal care or medical needs. According to the Accessible Customer Service standard, a support person must be allowed to accompany an individual with a disability to any part of the premises that is open to the public or to third parties.

- If you are not sure which person is the customer, take your lead from the person using or requesting the goods or services – or simply ask
- Speak directly to the customer, not to their support person

## **B. The Use of 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 MPS Property Services.

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.

## **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 MPS Property Services' 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.

### Exclusion Guidelines



If a guide dog, service animal or service dog is excluded by law (see applicable laws below) MPS Property Services 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

*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 pitbulls) 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, MPS Property Services may request verification from the customer.

#### Care and Control of the Animal:

The customer who 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, MPS Property Services will make all reasonable efforts to meet the needs of all individuals.

### **D. The Use of Support Persons**

If a customer with a disability is accompanied by a support person, HRdownloads will ensure that both persons are allowed to enter the MPS Property Services 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 HRdownloads 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.

### **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 MPS Property Services. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use MPS Property Services' 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; and
- A description of alternative services or options.

#### Notification Options

When disruptions occur MPS Property Services 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 MPS Property Services 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.

#### **F. Customer Feedback**

MPS Property Services 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 and notice of the process will be made available by (insert ways in which the process will be publicized). 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 MPS Property Services:

- Via email at [info@aboutmps.com](mailto:info@aboutmps.com)
- Via phone at 905-472-4842
- In person with a senior MPS manager

Or directly to:

Darryl Snider / General Manager, MPS Property Services

Phone: 905-472-4842

Email: [Darryl@aboutmps.com](mailto:Darryl@aboutmps.com)

Mailing Address: 2777 14<sup>th</sup> Ave., Markham, ON L3R 0G8

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any MPS Property Services Manager.

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





All feedback, including complaints, will be handled in the following manner:

- Review of the comment or complaint by MPS Property Services General Manager, HR Manager and MPS President.
- Customers can expect to hear back within seven days

## **G. Training**

Training will be provided to:

MPS Property Services will provide accessible customer service training to all employees and others who deal with the public or other third parties on our behalf. All team members will be trained through their initial Onboarding/Orientation process and in annual “tailgate” training sessions (twice per year).

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act and the requirements of the customer service standard
- MPS Property Services’ plan related to the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing MPS Property Services’ goods or services
- Staff will also be trained when changes are made to our Accessible Customer Service Plan

### Training Provisions

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 Customer Service Standards.
- 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 what to do if a person with a disability is having difficulty accessing your services.
- MPS Property Services' policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

### Training Schedule

MPS Property Services will provide training as soon as practicable. Training will be provided to new employees during their Onboarding/Orientation. Training will also be



provided via “tailgate” training sessions at least twice during the work year. Revised training will be provided in the event of changes to legislation, procedures, policies, and/or practices.

#### Record of Training

MPS Property Services will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

#### **H. Notice of Availability and Format of Documents**

MPS Property Services shall notify customers that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by MPS Property Services, the MPS Property Services' website, and/or any other reasonable method.

#### **Administration**

If you have any questions or concerns about this policy or its related procedures please contact:

Darryl Snider / General Manager, MPS Property Services

Phone: 905-472-4842

Email: [Darryl@aboutmps.com](mailto:Darryl@aboutmps.com)

Mailing Address: 2777 14<sup>th</sup> Ave., Markham, ON L3R 0G8

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.



## Acknowledgment and Agreement

I, \_\_\_\_\_, acknowledge that I have read and understand the AODA - Integrated Accessibility Standards Regulation (IASR) Customer Service Policy of MPS Property Services. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules/procedures outlined in this policy, I may face disciplinary action, up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_