

## **(100) (AODA) Accessibility Standards for Customer Service**

### **(100.A) 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 HSML shall follow the principles of dignity, independence, integration and equal opportunity.

### **(100.B) 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** – 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.

**(100.C) Guidelines**

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**

HSML 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.

## 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 HSML .:

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 HSML**

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.

### **Exclusion Guidelines**

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) HSML 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, labeling, 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, **HSML** 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, HSML 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, ' HSML 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 HSML 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, Whiting will ensure that notice is given in advance by posting notice of admission fees for support persons where HSML 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 HSML. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use HSML'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; and
- A description of alternative services or options.

### **Notification Options**

When disruptions occur HSML 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 HSML 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

HSML 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:

Employee Name and/or Position Title: **Bryan Beatty, Contracts & Risk Manager**

Phone Number: **905-732-7585 ext. 245**

Mailing Address: **350 Alexander St. Welland, ON L3B2R3**

Email Address: [bbeatty@whiting.ca](mailto:bbeatty@whiting.ca)

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any HSML employee. \*Update if feedback should only be supplied to specific individuals such as customer service, guides, hospitality, etc.\*

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 HSML; 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.
- HSML's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

## **Training Schedule**

HSML 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 (insert when such as, during orientation). Revised training will be provided in the event of changes to legislation, procedures and/or practices.

## **Record of Training**

HSML 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**

HSML shall notify customers that the documents related to the Accessibility Standard for Customer Service 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 HSML, HSML's website and/or any other reasonable method.

## **Administration**

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

**Bryan Beatty, Contracts & Risk Manager**

Phone Number: 905-732-7585 ext. 245

Mailing Address: 350 Alexander St. Welland, ON L3B2R3

Email Address : [bbeatty@whiting.ca](mailto:bbeatty@whiting.ca)

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

## **(101) Integrated Accessibility Standards Regulation (IASR) In Compliance with AODA**

### **(101.A) Intent**

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Employment Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by HSML shall follow the principles of dignity, independence, integration and equal opportunity.

### **(101.B) Definitions**

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Kiosk – An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

### **(101.C) General Principles**

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

A. [General Requirements](#)

B. [Recruitment, Assessment and Selection](#)

- C. [Accessible Formats and Communication Supports for Employees](#)
- D. [Workplace Emergency Response Information](#)
- E. [Documented Individual Accommodation Plans](#)
- F. [Performance Management and Career Development and Advancement](#)
- G. [Return to Work](#)
- H. [Redeployment](#)
- I. [Review](#)

## **(101.D) General Requirements**

General requirements that apply across all of the four (4) standards, Information and Communications, Employment, Transportation and Design of Public Spaces, are outlined as follows.

### **Establishment of Accessibility Policies and Plans**

HSML will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

HSML will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

HSML will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

HSML will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement HSML's accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

### **Procuring or Acquiring Goods and Services, or Facilities**

HSML will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

## **Training Requirements**

HSML will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing HSML's policies, and all other persons who provide goods, services or facilities on behalf of HSML.

Training will be provided as soon as is reasonably practicable, but no later than Dec.31, 2017.

Training will be provided on an ongoing basis to new employees and as changes to HSML's accessibility policies occur.

## **Records**

HSML will maintain records on the training provided, when it was provided and the number of employees that were trained.

HSML will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, HSML will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of HSML's policies and supports for accommodating people with disabilities.

## **C. Accessible Formats and Communication Supports for Employees**

HSML will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, HSML will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Whiting will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

## **D. Workplace Emergency Response Information**

Where required, HSML will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

**F. Performance Management and Career Development and Advancement**

HSML will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

*Individual accommodation plans will be consulted, as required.*

**G. Return to Work**

HSML will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps HSML will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

**H. Redeployment**

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

*Individual accommodation plans will be consulted, as required.*

**Review**

This policy will be reviewed regularly to ensure that it is reflective of HSML's current practices as well as legislative requirements.