


Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 1 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

1 POLICY

- 1.01** Four Counties Addiction Services Team (Fourcast) is committed to ensuring all programs and services provided by the organization are accessible to people with disabilities, and in compliance with the Accessibility for Ontarians with Disabilities Act (AODA). Our goal is to identify, remove and prevent barriers that might interfere with a person's ability to access our programs and services.
- 1.02** This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation* 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.
- 1.03** This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.

2 PURPOSE

- 2.01** The purpose of this policy is to outline the responsibilities of employees and volunteers of Fourcast in providing services to people with disabilities.


3 SCOPE

- 3.01** This policy is intended for all Fourcast employees and volunteers

4 RESPONSIBILITY

Employees and Volunteers are responsible for:

- Participating in all training related to AODA
- Adhere to the customer service policy in order to meet the needs of clients with disabilities
- Identifying any additional training or resources (including equipment) that might be needed to support a client
- Identifying any barriers that affect a client's ability to access services so that an appropriate solution can be found

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 2 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

Program Managers are responsible for:


- Identifying and eliminating barriers (where possible) that prevent clients from accessing programs and services
- If a barrier cannot be eliminated, managers will use all reasonable efforts to identify another appropriate option
- Handling requests for accommodation in a timely, confidential and sensitive manner
- Ensuring that employees have received all training related to supporting clients with disabilities as outlined in the AODA.

Human Resources is responsible for:

- Ensuring the organization has met compliance with AODA legislation
- Monitoring the implementation of policies and procedures and making any necessary changes in order to achieve compliance.
- Evaluate current policies and procedures and adjust in accordance with any legislative amendments or additions

Fourcast is responsible for:

- Eliminating barriers that prevent people from accessing, or being included in programs and services offered by Fourcast
- Minimizing the need for individual accommodation by regularly reviewing policies, by-laws and practices to ensure they are not discriminatory
- Ensuring all clients are advised of their right to be accommodated
- Handling requests for accommodation in a timely, confidential and sensitive manner
- Ensuring its policies, practices, and procedures are consistent with the principles of dignity, independence, integration and equal opportunity.

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 3 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	


5 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 clients 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.

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 4 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

Service Animal – 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/her/they 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 – a support person means, in relation to a person with a disability, another person who accompanies him/her/they in order to help with communication, mobility, personal care, medical needs or access to goods and services.


6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURES

Accessibility for Ontarians with Disabilities Act 2005 (AODA)

Ontario Human Rights Code

Dog Owners Liability Act, 2005:

6.05 Service Animal Policy

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 5 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

7 PROCEDURE


7.01 In accordance with the Accessibility Standards for 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. Client Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

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

Fourcast 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 clients receive the same value and quality;
- Allowing clients 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 clients with disabilities have access to the same services, in the same place and in a similar manner;
- Considering individual needs when providing goods and services; and
- Communicating in a manner that takes into account the client's disability.

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 6 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

7.03 B. The Use of Assistive Devices

Client's Own Assistive Device(s)

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Fourcast.

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 client with an oxygen tank may involve ensuring the client is in a location that would be considered safe for both the client and business. Alternatively, 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 client.

7.04 C. Guide Dogs and Service Animals


A client with a disability that is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. This includes reception areas, washrooms, group rooms and counsellor offices. "No pet" policies do not apply to guide dogs or service animals.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the client for reasons relating to their disability, Fourcast may request verification from the client.

Verification may include:

- A letter from a regulated health professional 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.

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 7 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

Care and Control of the Animal:

The client that is accompanied by a guide dog, or service animal is responsible for maintaining care and control of the animal at all times.


Allergies

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Fourcast will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each client's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyse all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 8 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

Dog Owners Liability Act, 2005:

If there is a conflict between a provision of this legislation 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. Staff will respectfully explain that the service animal must be removed from the public area due to a municipal by-law and make alternate arrangements or provide the service outside the public area.

7.05 D. The Use of Support Persons


If a client with a disability is accompanied by a support person, Fourcast will ensure that both persons are allowed to enter the premises together and that the client is not prevented from having access to the support person.

There may be times where seating and availability prevent the client and support person from sitting beside each other. In these situations, Fourcast will make every reasonable attempt to resolve the issue.

In certain cases, Fourcast might require a person with a disability to be accompanied by a support person for health and safety reasons of the person with a disability, and/or others on the premises. Before making this decision, Fourcast will:

- Consult with the person with a disability to understand their needs
- Consider health or safety reasons based on available evidence
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

In situations where confidential information might be discussed, consent will be obtained from the client prior to any conversation where confidential information might be revealed.

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 9 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

7.06 **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 Fourcast. In the event of any temporary disruptions to facilities or services that clients with disabilities rely on to access or use Fourcast's 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 Fourcast 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;
- contacting clients with appointments by phone, email or text;
- verbally notifying clients when they are making a reservation or appointment;
or
- by any other method that may be reasonable under the circumstances.

7.07 **F. Client feedback**

Fourcast shall provide clients with the opportunity to provide feedback on the service provided to clients with disabilities. Information about the feedback process will be readily available to all clients and notice of the process will be made available through Fourcast's Statement of Commitment, company website,

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 10 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

and through discussion with Fourcast employees. Feedback forms (see Appendix A) along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (handwritten, delivered, or email), will be available upon request.

Submitting Feedback

Clients can submit feedback to:

**Human Resources Department
705-876-1292
130 Hunter St West, Unit 200 Peterborough Ontario K9H 2K8**

Clients who provide formal feedback will receive acknowledgement of their feedback if requested, along with any resulting actions based on concerns or complaints that were submitted. All feedback that has been received will be reviewed within 7 business days.

7.08 **G. Training**


Training will be provided to:

- All employees and volunteers with Fourcast
- Every person who participates in developing the policies of Fourcast; and
- Every other person who provides goods, services, or facilities on behalf of Fourcast

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 Accessibility Standards for Customer Service standards
- Instructions on how to interact and communicate with people with various

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 11 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

- types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog or other service dog; or
 - require the use of a support person.
 - 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 our services.
 - Fourcast's policies, procedures and practices pertaining to providing accessible customer service to clients with disabilities.
 - Review of other applicable AODA policies. Service Animals; Information and Communication Policy; Employment Policy.

SEP

Training Schedule


Training will be provided to new employees, volunteers, agents and/or contractor during orientation. Revised training will be provided in the event of changes to legislation, policies, procedures and/or practices.

Record of Training

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

7.09 H. Notice of Availability and Format of Documents


Fourcast shall notify clients that upon request any documents provided by the organization can be provided 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 Fourcast, the Fourcast's website and/or any other reasonable method.

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 12 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

7.10 Administration

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

Human Resources Department
705-876-1292 ext 254
130 Hunter St West Unit 200, Peterborough ON K9H 2K8

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 13 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

Appendix A

Client Accessibility Feedback Form

Thank you for visiting Four Counties Addiction Services Team (Fourcast). We value all of our clients and strive to meet everyone's needs. Your feedback is important in helping us improve accessible services at Fourcast.

Please take a moment to complete this feedback form and let us know how we are doing.

Please tell us the date and location of your visit:

Date: _____ Location: _____

1. Were you satisfied with the customer service we provided you?


<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
Comments/Recommendations:		

2. Was our customer service provided to you in an accessible manner?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
Comments/Recommendations:		

3. Did you experience any problems accessing our programs or services?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Somewhat
Comments/Recommendations:		

Human Resources Policy: Section: <u>Organizational Policies</u>	
Subject: Customer Service Policy Accessibility for Ontarians with Disabilities	
Policy Number: HR- 6.04d	Page(s): Page 14 of 14
Originated: November 2015	Approved By: Management
Revised: October 2023	Approval Date: October 2023
Reviewed:	

Continued...

4. Any additional feedback you would like to provide?

Contact Information (optional)

Name: _____ Phone Number: _____

Address: _____

Email: _____

Would you like someone from Fourcast to contact you regarding your feedback?

(clients will be contacted within 7 business days of receiving the feedback)

Yes No

How would you like to be contacted?

Telephone Email Mail

Thank you for your feedback!

If you have any questions regarding accessibility services at Fourcast, please contact:

**Human Resources Department
705-876-1292**