

## Highland Shores Children's Aid Society Procedure

<b>Service Area:</b>	Human Resources, AODA
<b>Procedure Title:</b>	AODA Customer Service Standards Procedure
<b>Associated Policy:</b>	
<b>Effective Date:</b>	May 25, 2020 <b>Approved:</b> May 25, 2020
<b>Reference Number:</b>	2918

### Background:

The following procedure has been developed in accordance with the *Accessibility Standards for Customer Service* (Regulation 429/07), which came into force on January 1, 2008, under the *Accessibility for Ontarians with Disabilities Act, 2005*, (AODA).

Regulation 429/07 establishes accessibility standards specific to customer service for organizations that provide goods and services to members of the public. Designated public sector organizations, including the Highland Shores Children's Aid (HSCA), must comply with this standard as of January 1, 2012.

This procedure is drafted 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

### Definition of Terms

**Barrier:** AODA defined a barrier as anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. This includes physical barriers, an architectural barrier, information or communications barriers, an attitudinal barrier, a technological barrier, and a policy or a practice.

**Disability:** as defined by AODA and 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, 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 a 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*.

Employee includes all HSCA employees, including full-time, part-time, temporary, casual, and summer.

**HSCA is committed to:**

- promoting, providing and maintaining an environment where respect and dignity are demonstrated at all times;
- ensuring equal access to, and participation in, the Society's services for all service recipients;
- identifying issues of accommodation and accessibility in connection with the delivery of the Society's services and addressing such issues in a manner that facilitates effective access to, and participation in, the Society's services;
- identifying, assessing and responding to the accommodation or accessibility issues identified by individuals with respect to access to, or participation in, the Society's services;
- removing barriers related to accessibility and accommodation issues identified by participants in the Society's services including, but not limited to, physical barriers, informational barriers, and communication barriers;
- serving persons with disabilities who use assistive devices to obtain, use or benefit from services, and to purchasing additional technology, as appropriate, to ensure accessibility in accordance with AODA and all associated regulations.
- providing services to persons with a disability who are accompanied by a service animal or who are accompanied by a support person;
- receiving and responding to feedback about the manner in which it provides services to persons with disabilities;
- providing service recipients with appropriate notice in the event of a planned or unexpected disruption in the facility or services used by persons with disabilities;
- providing training to all staff, volunteers, contractors, consultants and third parties acting on behalf of HSCA on the requirement of the standards and appropriate training records are maintained;
- providing notice that, upon request, HSCA will provide a copy of this procedure and any support documents to any person;
- providing notice of availability on the website and by other printed methods.

## **1. Employee's role in removing barriers in service delivery**

Employees will be aware of their roles and responsibilities under this procedure and any associated procedures and will address issues of accommodation and accessibility identified in the delivery of HSCA services in a manner that facilitates effective access to, and participation in, HSCA services.

Each employee will demonstrate sensitivity and responsiveness to any accommodation or accessibility issue that comes to their attention in the course of any service delivery activity, including broader community communication and interactions.

Whenever a person identifies a barrier that limits their ability to participate in the HSCA services, the employee will promptly communicate HSCA's commitment to address the relevant accommodation and/or accessibility issues.

When the employee identifies a barrier that limits an individual's ability to participate in HSCA services, the employee will raise the issue with the person experiencing the barrier and confirm HSCA's commitment to resolving the situation.

Where barriers are reported or identified the employee will engage the person experiencing the barrier in a discussion to understand:

- the precise nature and source of the barrier;
- the impact of the barrier on the person's ability to receive or participate in HSCA's services.

The employee will consult with the individual with the disability in determining a response to the need.

Once the specific impact of the barrier is understood, the employee will assess what is required to resolve the barrier in consultation with their immediate Supervisor, when necessary. When it is appropriate, the Supervisor and/or employee will seek advice from relevant departments and develop proposed steps for addressing the identified barrier.

The employee shall communicate to the person experiencing the barrier the steps proposed to accommodate or resolve the accessibility issue. If the service recipient is satisfied with the proposed measures to resolve the issue, implementation may proceed.

When the person does not agree with the proposed measures to resolve the barrier, further consultation with the supervisor and/or the appropriate department should occur prior to confirming a final decision to the individual.

## **2. Access to Documents**

Procedures related to the *Accessibility for Ontarians with Disabilities Act, 2005* will be made available to the public and HSCA will have the capacity to provide communication about these and procedures in a format that takes into account a person's disability.

### 3. Emergency Procedures Plans or Public Safety Information

Upon request, any HSCA emergency procedures, plans or public safety information that are available to the public, will be provided in an accessible format, or with appropriate communication support, as soon as practical. Such requests should be forwarded to the Property Coordinator.

### 4. Training

Human Resources will provide training as required by the *Accessibility for Ontarians with Disabilities Act, 2005*.

### 5. Use of Assistive Devices

**Assistive Device:** Assistive Devices are used by people with disabilities to help with daily living. They include a broad range of products such as, but not limited to: walkers, canes, wheelchairs, oxygen tanks, portable chalk boards, scooters, amplification devices that boost sound for listeners who are hard-of-hearing without reducing background noise, electronic notebooks or laptop computers, personal data managers, communication boards used to communicate using symbols, words to pictures or speech-generating devices that “speak” when a symbol, word or picture is pressed, and may be brought with them to Highland Shores Children’s Aid (HSCA).

People with disabilities may provide their own assistive device for the purpose of obtaining, using and benefiting from HSCA goods and services. Exceptions may occur in situations where HSCA has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others.

Employees shall inform service recipients and stakeholders of any assistive devices available for their use.

Employees will be trained, as appropriate, on how to use the Society’s assistive devices that may be available for use by service recipients.

Request for new or additional assistive devices will be forwarded to the Manager, Information Services, for consideration, in consultation with other appropriate departments.

Currently Highland Shores Children’s Aid is using a TTY Service through “Bell Relay Service”.

**How Bell Relay Service works for a TTY user:** Persons who are deaf, hard of hearing or have a speech disability may use a TTY to type their conversations to a Bell Relay operator. The operator then reads the typed conversation to the other party. The Bell Relay operator then types the other party’s spoken words back to the TTY user.

#### **HSCA Staff Guidelines:**

1. When communicating with a person with a disability, do so in a manner that takes into account that person’s disability.
2. Think about and/or learn how people with disabilities communicate. Be flexible in planning your approach. The use of written, spoken, or picture form or other assistive devices may be useful.

3. Ask the person directly about their preferred method of communication.
4. Plan ahead, where possible, to ensure the appropriate assistive device is available.

## 6. Use of Service Animals

**“Guide dog”** means a dog trained as a guide for a blind person and having the qualification prescribed by the regulations of the *Blind Persons Act*.

**“Service Animal”** means “an animal is a service animal for a person with a disability:

- a) If it is readily apparent that the animal is used by the person for reasons related to his or her disability; or
- b) If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability.”

Examples of service animals include dogs used by people who are blind, hearing alert animals for people who are deaf, deafened or hard of hearing, and animals trained to alert an individual to an oncoming seizure and lead them to safety.

Employees shall accommodate the use of service animals by persons with a disability who are accessing HSCA services. People with disabilities may enter the premise and parts of the premises open to the public or third parties accompanied by their service animal and may keep the service animal with them, unless the service animal is otherwise excluded by law.

If a service animal is excluded by law, a HSCA designate or assigned worker will use reasonable efforts to ensure that alternate means are available to enable the service recipient with a disability to obtain, use or benefit from HSCA services.

If it is not readily apparent that the animal is a service animal, a HSCA designate or assigned worker may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the service animal for reasons relating to his or her disability. In cases where there is no assigned worker this responsibility will fall to the receptionist on duty.

It is the responsibility of the person with a disability to keep their service animal in control at all times. This provision includes controlling the behavior of the animal, cleaning up after the animal, and being responsible for any damage caused to HSCA property by the animal.

When a service animal is unruly or disruptive (jumping on people, biting, or other harmful behaviour) an employee may ask the person with a disability to remove the service animal from the area. Other reasonable arrangements to provide services shall be explored with the assistance of the person with a disability.

Should the employee experience an allergy, fear or trepidation of the service animal other reasonable arrangements to provide services shall be explored with the employee.

A service dog can be excluded if it is a breed that is prohibited by law. An example would be the *Ontario Dog Owners' Liability Act* which places restrictions on pit bull terriers.

## **7. Use of a Support Person**

A “**support person**” means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care or medical needs or with access to goods or services. This may be a paid professional, volunteer family member, or a friend who will assist and support the service recipient.

The Highland Shores Children’s Aid welcomes all members of the community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of people with disabilities, including the use of support persons.

In the event that services are unable to be delivered to the person with a disability due to the presence or absence of a support person for reasons, such as consents not signed, the employee will explore alternative ways for the person with the disability to access the services.

The absence of a support person cannot unreasonably delay the provision of child protective services.

If an admission fee is charged in connection with a support person’s presence at an event or function, HSCA will ensure that notice is given in advance to a support person about the amount payable. This notice shall also be posted in a conspicuous place.

The Society may require a person with a disability to be accompanied by a support person, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others. In this situation, discussion should occur with the person with a disability concerning the Society’s requirement for a support person.

The assessment of the requirement of a support person by the Society must be based on consideration of the nature, type and duration of risk, the likelihood, nature and severity of the potential harm, and whether or not the risk can be eliminated or reduced by other means.

### **a. Access to Highland Shores Children’s Aid Premises**

Any person with a disability accompanied by a support person will be welcomed on all Highland Shores Children’s Aid premises with his or her support person. Access will be in accordance with normal security procedures.

This requirement applies only to those areas of the premises where the public or third parties customarily have access and does not include places or areas of the HSCA offices where the public does not have access.

### **b. Confidentiality**

Where a support person is accompanying a person with a disability for the purpose of assisting in a discussion and/or in a situation that may involve confidential information, the staff member working with this individual must first secure the written consent of the individuals concerned regarding such disclosure.

The support person must also provide assurance, in writing, that they will safeguard the confidentiality of information disclosed.

A copy of the signed consent document will be retained in the appropriate Highland Shores Children's Aid file.

If the person with a disability uses a different support person for subsequent meetings, a new signed consent will be required.

See [AODA - Use of Support Persons Consent Form](#)

## 8. Notice of a Service Disruption

People with disabilities may rely on certain facilities, services or systems in order to access the services and facilities of the HSCA offices. For example, elevators, automatic doors, accessible washroom, webpage and alternative communication devices.

When those facilities or services are temporarily unavailable, or if they are expected to be temporarily unavailable, in the near future, a notice of disruption of service is required.

The [AODA - Notice of Service Disruption Form](#) is an approved alternative form that can be used to provide notice. A notice of service disruption (temporary, planned or unplanned) will include the following:

- Reason for the disruption;
- Anticipated duration of the disruption
- A description of alternate facilities or services, if any; and
- Appropriate contact information.

**Expected Disruption:** If a disruption in services is planned and expected, HSCA will provide as much notice as possible, including the necessary information noted above.

**Unexpected Disruption:** In the event of an unexpected disruption in service, HSCA will provide notice as soon as possible.

The Property Coordinator is responsible to communicate any planned or unplanned disruptions in services related to building and property issues. Notice should be posted in visible places, such as front door, the HSCA website, communicated within the organization, or any other method that may be reasonable under the circumstances, and in a timely manner.

The Executive Assistant is responsible to communicate any planned or unplanned disruptions in services related to website or other communications supports. Notice should be posted in visible places, on the HSCA website, communicated within the organization, or any other method that may be reasonable under the circumstances, and in a timely manner.

## 9. Feedback process

The AODA legislation requires a feedback process regarding services to individuals with disabilities. Feedback, from the public and employees, is welcomed, as it may identify areas that require change and encourage continuous service improvements or identify areas where HSCA is successfully meeting the needs of persons with disabilities.



Individuals may provide feedback through a variety of ways including, in person, by mail, e-mail, telephone, fax, through the *AODA Feedback Form* available on the HSCA website or from any HSCA employee.

Feedback may be accepted by any employee, in whatever format it is provided, and directed to the Executive Assistant or designate. The Executive Assistant, or designate, will document and track all feedback.

All feedback will be reviewed for possible action that can be taken to improve HSCA services and our compliance with the *AODA* and its Regulations.

The *AODA – Customer Service Procedure* which includes the feedback process is available to any person, upon request. It is also available on the HSCA website. HSCA will endeavor to ensure that the feedback/response is in a format that is accessible to the person with a disability.

For individuals who have left contact information and contact has been requested, the Executive Assistant, or designate, will respond to the request within five business days.

A summary of responses received under the feedback process will be reviewed regularly by the Senior Leadership Team.

## **10. Communication Supports**

Upon the request of the person with a disability, HSCA will provide, or arrange for the provision of, accessible formats and communications support.

Notice of availability of any such supports will be provided on the HSCA website, within an organizational policy/procedure, and through other printed methods.

HSCA will consult with the individual making the request in determining the suitability of the accessible format or communication support.

When communicating with an individual with a disability, employees shall do so in a manner that respects the person's disability.

As may be necessary, employees will offer to communicate with service recipients and stakeholders by email, or other agreed upon methods, if telephone communication is not suitable to their communication needs or is not available.

HSCA will continue to review the nature, manner, and methods with which its employees communicate with people with disabilities in order to improve the accessibility of information and services.

Service recipients may request alternate formats and communication support through their case workers.

Employees may request alternate formats and communication support for information necessary to do their job, or information generally available to all employees, through their supervisor or other appropriate individual, depending on the information requested.

Individuals not receiving services may request assisted formats through the Receptionist, Executive



Assistant or HSCA website.

**References:**

[Human Rights in the Workplace Policy](#)  
[Accommodation in the Workplace Procedure](#)  
[AODA - Use of Support Persons Consent Form](#)  
[AODA - Accessible Customer Service/Employee Feedback Form](#)  
[AODA - Notice of Service Disruption Form](#)  
[AODA - Individual Emergency Response Form](#)

**Background Documents:**

*Accessibility for Ontarians with Disabilities Act, 2005*  
*Accessibility for Ontarians with Disabilities Act, 2005 Customer Service Standard 429/07*  
*Blind Person's Rights' Act. R.S., c. 40, s. 1*  
*Ontario Dog Owners' Liability Act*