

**Township of South-West
Oxford
General Policy Manual**

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**POLICY: Accessibility Standards for
Customer Service Policy**

SECTION: Administration

EFFECTIVE DATE: December 15, 2009

REVISED:

APPROVED BY: CAO

SIGNATURE:

Policy Statement

This policy establishes the customer service standard for all Township employees to provide accessible service to our customers and governs the manner of conduct to ensure the dignity and independence of all our customers.

Purpose

The Township of South-West Oxford is committed to providing exceptional and accessible service for our customers. Goods and services will be provided in a manner that respects the dignity and independence to all customers. The provision of services to persons with disabilities will be integrated wherever possible. Persons with disabilities will be given an opportunity equal to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of the Township of South-West Oxford.

Principles

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, Ontario Regulation 429/07 entitled "Accessibility Standards for Customer Service" came into force on January 1, 2008. This 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 drafted in accordance with the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and addresses the following:

- (a) The provision of goods and services to persons with disabilities;
- (b) The use of support persons by persons with disabilities;
- (c) Customer feedback regarding the provision of goods and services to persons with disabilities;
- (d) Notice of temporary disruptions in services and facilities;

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- (e) The use of service animals by persons with disabilities;
- (f) Notice of availability and format of documents;
- (g) Training; and
- (h) The use of assistive devices by persons with disabilities

This policy applies to all persons who deal with members of the public or other third parties on behalf of the Township of South-West Oxford, whether the person does so as an employee, member of Council, agent, volunteer, student on placement, or otherwise and, all persons who participate in developing the Council's policies, practices and procedures governing the provision of goods and services to members of the public or other third parties.

Implementation

Support Persons

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 or medical needs or with access to goods or services.

The Township of South-West Oxford will allow people with disabilities the opportunity to be accompanied by a support person in all municipally owned and operated public facilities. The Township of South-West Oxford reserves the right to request the person with a disability be accompanied by a support person, in the event that it is considered necessary to protect the health and safety of the person with a disability or others on the premises.

The Township of South-West Oxford will waive admission fees for support persons who accompany a person with a disability, into facilities where admission is charged by the Municipality.

- (a) Member of public should notify a staff member that a support person is present.
- (b) Admission fees will be waived for the support person.
- (c) If there is confidential information to be disclosed, consent must be received from the person with the disability.

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Feedback Process

The Township of South-West Oxford is committed to providing high quality goods and services to all members of the public. Feedback from the public is welcome as it may identify areas that require change and encourage continuous service improvements.

The Township of South-West Oxford accepts feedback from the public through the following methods:

- (a) Township Website
- (b) In Person
- (c) Telephone
- (d) Written complaint or suggestion

To submit a complaint:

Should a member of the public wish to make a complaint regarding the service they have received:

- (a) The member of the public with the complaint or concern should have a discussion with the staff person at the Township of South-West Oxford who is involved in the situation.
- (b) Should the discussion not resolve the complaint or the member of the public is uncomfortable discussing the issue with the staff person, the member of the public should fill out a *complaint form*. A staff person can assist the member of the public with the complaint form in a manner that takes into consideration their disability.
- (c) The information to be provided by the member of the public should include their personal contact information, the date, a description of the complaint, and what the member of the public requests to resolve the complaint. This information should be documented on the complaint form.
- (d) The complaint should be forwarded to the Chief Administrative Officer and the Director responsible for the department.
- (e) The Chief Administrative Officer will attempt to resolve the complaint in a timely manner, with the assistance of municipal staff, if necessary.
- (f) The member of the public will be contacted once a resolution has been reached.

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To submit a suggestion:

Should a member of the public wish to provide the Township of South-West Oxford with a suggestion on how to improve our service:

- (a) Member of the public will inform staff of suggestion
- (b) Staff member will assist member of the public in filling out the *suggestion form*, should they require assistance.
- (c) The suggestion should be forwarded to the Chief Administrative Officer, and the department head.
- (d) Member of the public will be notified in a timely manner of how the Township of South-West Oxford will proceed with their suggestion.
- (e) Staff response should include: an explanation of how we will implement the suggestion, a response indicating further investigation or an explanation why we are unable to implement the suggestion.

All complaints and suggestions should be recorded on a complaint or suggestion form, and where applicable, forwarded to the Chief Administrative Officer of the Township. Complaint or suggestion forms will be available on the Township website and in each individual department.

Service Disruption

The Township of South-West Oxford is aware that the operation of its services and facilities is important to the public. However, temporary disruptions in the Municipality's services and facilities may occur due to reasons that may or may not be within the Municipality's control or knowledge.

The Director or his/her Designate of the affected "disruption" will ensure that the notice is provided to the public and municipal staff is informed if needed.

Advance notice will be provided where possible to the public in a variety of forms. These forms include:

- (a) Posting of signage in affected areas
- (b) Township website

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(c) Direct Mail/ Newspaper Advertisement

The notice must include the following information:

- (a) The reason for disruption in service
- (b) Anticipated duration
- (c) Description of alternate facilities or services, if available
- (d) Contact information

If the Township of South-West Oxford website should experience a temporary service disruption, advanced notice where possible, keeping with the conditions of the service disruption section of this policy, shall be provided on the website.

Service Animals

For the purpose of this policy, a 'service animal' is defined as either:

- (i) A "guide dog", as defined in Section 1 of the *Blind Persons Rights' Act*; or
- (ii) A "service animal" for a person with a disability. For the purpose of this policy, 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 the reasons relating 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 relating to the disability.

The Township of South-West Oxford will allow the person and the animal onto all Township of South-West Oxford owned and operated public facilities (areas that are open to the public) and will ensure that the person is permitted to keep the animal with him or her unless the animal is otherwise excluded by law. The care and control of a service animal is the responsibility of the owner and/or support person.

If a service animal is excluded by law from the premises, the provider of goods or services shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the provider's goods or services.

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Format of Documents

Should the Township of South-West Oxford be required to give a copy of a document to a person with a disability, the Township of South-West Oxford shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability, unless it is not technically feasible to do so and subject to the provisions of the Municipal Freedom of Information and Privacy Act.

Material printed in-house and publications produced on behalf of the Township of South-West Oxford should contain a note indicating, "alternate formats are available upon request" and include relevant contact information.

The Township of South-West Oxford and the person with a disability will try to agree upon the format to be used for the document or information, subject to feasibility requirements of this policy.

Alternative formats that should be considered by the Township of South-West Oxford and the person with the disability will include, but are not limited to:

(i) Print Requests:

Requests for alternative formats should be honoured in the most practical manner depending on the media chosen, the size and complexity of the document, the quality and source of the documents, the feasibility of the request (including the cost) and the number of documents to be converted. It should be noted that when a request for one of these formats is received and deemed feasible, staff should make every attempt to respond to the request in the most practical manner and to the satisfaction of the requestor. If it is determined that the format requested is not feasible, then other alternative methods of providing the information should be explored that will still meet the needs of the requestor (e.g. Audio CD or explaining the information verbally etc.).

- (a) Staff member receives request from member of the public for alternative format
- (b) Employee fills out alternative format request form.
- (c) Forwards request onto the Chief Administrative Officer
- (d) The Chief Administrative Officer will determine feasibility, if feasible

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- (e) Proceed with alternative format request
- (f) If not feasible, contact individual with feasible solution

- (ii) ASL Interpreter Request:
 - (a) Employee receives request from public for ASL Interpreter
 - (b) Employee fills out alternative format request form
 - (c) Forward request onto the Chief Administrative Officer
 - (d) Chief Administrative Officer or Designate contact Canadian Hearing Society to make request
 - (e) Once Canadian Hearing Society confirms attendance of ASL Interpreter, the responsible department contacts individual
 - (f) If ASL Interpreter is not available, individual will be contacted with an alternative solution

Feasibility will be determined based upon cost in relation to size of document and time associated with processing document requests.

The time frame attached to the conversion process varies depending on the media chosen, the size, complexity, quality of source documents and number of documents to be converted. Documents shall be returned in a timely manner depending on the factors previously noted.

Conversion shall be processed in-house wherever possible. When a member of the public requests a piece of Municipal documentation in a multiple format, the department of origin shall be responsible for the cost of the conversion, materials and distribution, not the public requestor.

In-house printing, where possible, should adhere to the CNIB's Clear Print Standards.

Training

The Township of South-West Oxford shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities:

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- (a) Every person who deals with members of the public or other third parties on behalf of the Municipality, whether the person does so as an employee, agent, volunteer or otherwise.
- (b) Every person who participates in developing the Township's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties.

The training will include a review of the purposes of the Act and the requirements of this policy and instruction about the following matters:

- (a) How to interact and communicate with persons with various types of disability, as outlined in this policy and procedures.
- (b) How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person, as outlined in this policy and procedures.
- (c) How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
- (d) What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

The Township of South-West Oxford will log and retain records which will record the details of the training provided, as well as the name of the person, location, and date the training was completed.

The Township of South-West Oxford will customize the training going forward, based on the actual experiences and usage of the persons with disabilities in Township of South-West Oxford owned or operated facilities.

The Township of South-West Oxford will incorporate the training into the Health & Safety Orientation for new hires. Presentation materials will also be made available so that they can be used during staff meetings and workshops as required.

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Assistive Devices

The Township of South-West Oxford will allow persons with disabilities to use their own personal assistive devices to obtain, use or benefit from the services offered by the Township of South-West Oxford.

Should a person with a disability be unable to access the Township's services through the use of their own personal assistive device, the Township of South-West Oxford will ensure the following measures:

- (a) Determine if service is inaccessible, based upon individual requirements
- (b) Assess service delivery and potential service options to meet the needs of the individual.
- (c) Notify person with disability of alternative service and how they can access the service, temporarily or on a permanent basis

Administration

All members of Council, staff and volunteers or third parties that deal with the public shall follow this policy.

Attachments

Attachment A – Best Practices and Procedures
Attachment B – Sample Forms

ATTACHMENT A
Township of South-West Oxford
Accessibility Standards for Customer Service

BEST PRACTICES AND PROCEDURES

Physical

Physical disabilities include a range of functional limitations from minor difficulties in moving or coordinating one part of the body, through muscle weakness, tremors, and paralysis. Physical disabilities can be congenital such as Muscular Dystrophy; or acquired, such as tendonitis.

A physical disability may affect an individual's ability to:

- Perform manual tasks such as holding a pen, turning a key or grip a door knob
- Move around independently
- Control the speed or coordination of movements
- Reach, pull or manipulate objects
- Have strength or endurance

There are many types and degrees of physical disabilities, and not all require a wheelchair. It may be difficult to identify a person with a physical disability.

Tips on serving customers who have physical disabilities:

- Speak normally and directly to your customer. Don't speak to someone who is with them
- People with physical disabilities often have their own way of doing things. Ask before you help
- Wheelchairs and other mobility devices are part of person's personal space, don't touch, move or lean on them
- Provide you customer information about accessible features of the immediate environment (automatic doors, accessible washrooms, etc.)
- (a) Keep ramps and corridors free of clutter
- (b) If a counter is too high or wide, step around it to provide service
- (c) Provide seating for those that cannot stand in line
- (d) Be patient. Customers will identify their needs to you.

2 Hearing

2.01 Hearing loss can cause problems in distinguishing certain frequencies, sounds or words. A person who is deaf, deafened or hard-of hearing may be unable to:

- (a) Use a public telephone
- (b) Understand speech in noisy environments
- (c) Pronounce words clearly enough to be understood by strangers

2.02 Like other disabilities, hearing loss has a wide variety of degrees. Remember, customers who are deaf or hard of hearing may require assistive devices when communicating.

2.03 Tips on serving customers who are deaf or hard of hearing:

- (a) Attract the customer's attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand.
- (b) Always ask how you can help. Don't shout. Speak clearly
- (c) Be clear and precise when giving directions and repeat or rephrase if necessary. Make sure you have been understood.

- (d) Face the person and keep your hand and other objects away from your face and mouth.
- (e) Deaf people may use a sign language interpreter to communicate – always direct your attention to the Deaf person – not the interpreter.
- (f) Any personal (e.g. financial) matters should be discussed in a private room to avoid other people overhearing
- (g) If the person uses a hearing aid, try to speak in an area with few competing sounds
- (h) If necessary, write notes back and forth to share information
- (i) Don't touch service animals – they are working and have to pay attention at all times

3 Deaf-Blindness

- 3.01 Deaf-blindness is a combination of hearing and vision loss. The result for a person who is deaf-blind is significant difficulty accessing information and performing daily activities. Deaf-blindness interferes with communication, learning, orientation and mobility. People who are deaf-blind communicate using various sign language systems, Braille, telephone devices, communication boards and any combination thereof. Many people who are deaf-blind use the services of an Intervener who relay information and facilitate auditory and visual information and act as sighted guides.
- 3.02 Most people who are deaf-blind will be accompanied by an intervener, a professional who helps with communicating.
- 3.03 Interveners are trained in special sign language that involves touching the hands of the client in a two-hand, manual alphabet or finger spelling, and may guide and interpret for their client.
- 3.04 Tips on serving customers who are deaf-blind:
- (a) Do not assume what a person can or cannot do. Some people who are deaf-blind have some sight or hearing, while others have neither.
 - (b) A customer who is deaf-blind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them Do not touch or address the service animals – they are working and have to pay attention at all times
 - (c) Never touch a person who is deaf-blind suddenly or without permission unless it's an emergency
 - (d) Understand that communication can take some time – Be patient
 - (e) Direct your attention to your customer, not the Intervener.

4 Vision

- 4.01 Vision disabilities reduce one's ability to see clearly. Very few people are totally blind. Many have limited vision such as tunnel vision, where a person has a loss of peripheral or side vision, or a lack of central vision, which means they cannot see straight ahead. Some can see the outline of objects while others can see the direction of light.
- 4.02 Vision loss can result in:
- (a) Difficulty reading or seeing faces
 - (b) Difficulty maneuvering in unfamiliar places
 - (c) Inability to differentiate colours or distances

- (d) A narrow field of vision
- (e) The need for birth light, or contrast

4.03 Night blindness Vision disabilities can restrict your customers' abilities to read signs, locate landmarks or see hazards. In some cases, it may be difficult to tell if a person has vision disability. Others may use a guide dog or white cane.

4.04 Tips on serving customers who have vision difficulties: Verbally identify yourself before making physical contact

- (a) If the person uses a service animal – do not touch or approach the animal – it is working
- (b) Verbally describe the setting, form, location as necessary
- (c) Offer your arm to guide the person. Do not grab or pull.
- (d) Never touch your customer without asking permission, unless it is an emergency
- (e) Don't leave your customer in the middle of a room. Show them to a chair or guide them to a comfortable location.
- (f) Don't walk away without saying good-bye

5 Intellectual

5.01 Intellectual disabilities affect a person's ability to think and reason. It may be caused by genetic factors such as Down's Syndrome, exposure to environmental toxins, such as Fetal Alcohol Syndrome, brain trauma or psychiatric disorders.

5.02 A person with an intellectual disorder may have difficulty with:

- (a) Understanding spoken and written information
- (b) Conceptual information
- (c) Perception of sensory information
- (d) Memory

5.03 People with intellectual or developmental disabilities may have difficulty doing many things most of us take for granted. These disabilities can mildly or profoundly limit one's ability to learn. You may not be able to know that someone has this disability unless you are told, or you notice the way people act, ask questions or use body language.

5.04 As much as possible, treat your customers who have an intellectual or developmental disability like anyone else. They may understand more than you think, and they will appreciate you treating them with respect.

5.05 Tips for serving customers who have an intellectual or developmental disability:

- (a) Don't assume what a person can or cannot do
- (b) Use clear, simple language
- (c) Be prepared to explain and provide examples regarding information
- (d) Remember that the person is an adult and unless you are informed otherwise, can make their own decisions
- (e) Be patient and verify your understanding
- (f) If you can't understand what is being said, don't pretend. Just ask again
- (g) Provide one piece of information at a time
- (h) Speak directly to your customer, not to their companion or attendant

6 Speech

- 6.01 Speech disabilities involve the partial or total loss of the ability to speak. Typical disabilities include problems with:
- (a) Pronunciation
 - (b) Pitch and loudness
 - (c) Hoarseness or breathiness
 - (d) Stuttering or slurring
- 6.02 Some people have problems communicating. It could be the result of cerebral palsy, hearing loss, or another condition that makes it difficult to pronounce words, causes slurring or stuttering, or not being able to express one's self or understand written or spoken language.
- 6.03 Some people who have severe difficulties may use communication boards or assistive devices.
- 6.04 Tips on serving customers with speech or language impairments:
- (a) If possible communicate in a quiet environment
 - (b) Give the person your full attention. Don't interrupt or finish their sentences
 - (c) Ask them to repeat as necessary, or to write their message
 - (d) If you are able, ask questions that can be answered 'yes' or 'no'
 - (e) Verify your understanding
 - (f) Patience, respect and willingness to find a way to communicate are your best tools

7 Learning

- 7.01 Learning disabilities include a range of disorders that affect verbal and non-verbal information acquisition, retention, understanding and processing. People with a learning disability have average or above average intelligence but take in and process information and express knowledge in different ways.
- 7.02 Learning disabilities may result in:
- (a) Difficulties in reading
 - (b) Problem solving
 - (c) Time management
 - (d) Processing information
- 7.03 Tips on serving customers with learning disabilities:
- (a) Learning disabilities are generally invisible and ability to function varies greatly – respond to any requests for verbal information, assist in filling in forms, etc with courtesy.
 - (b) Allow extra time to complete tasks, if necessary.

8 Mental Health

- 8.01 Mental health disabilities include a range of disorders, however there are three main types of mental health disability:
- (a) Anxiety
 - (b) Mood
 - (c) Behavioral

- 8.02 People with mental health disabilities may:
- (a) seem edgy or irritated
 - (b) act aggressively;
 - (c) be perceived as pushy or abrupt
 - (d) be unable to make a decision
 - (e) start laughing or get angry for no apparent reason
- 8.03 Tips on serving customers with mental health disabilities:
- (a) Treat each person as an individual. Ask what would make him/her the most comfortable and respect his/her needs to the maximum extent possible
 - (b) Try to reduce stress and anxiety in situations
 - (c) Stay calm and courteous, even if the customer exhibits unusual behaviour, focus on the service they need and how you can help.

9 Other

- 9.01 Smell disabilities can involve the inability to sense smells or a hypersensitivity to odours and smells. A person with a smelling disability may have allergies to certain odours, scents or chemical or may be unable to identify dangerous gases, smoke, fumes and spoiled food.
- 9.02 Touch disabilities can affect a person's ability to sense texture, temperature, vibration or pressure. Touch sensations may be reduced or heightened resulting in a hypersensitivity to touch, temperature, or the opposite, numbness and the inability to feel touch sensations.
- 9.03 Taste disabilities can limit the experience of the four primary taste sensations: sweet, bitter, salty and sour. A person with a taste disability may be unable to identify spoiled food or noxious substances.
- 9.04 Other disabilities result from a range of other conditions, accidents, illnesses and diseases including ALS, asthma, diabetes, cancer, HIV/AIDS, environmental sensitivities, seizure disorders, heart disease, stroke and joint replacement.
- 9.05 Disabilities are not always visible or easy to distinguish.

ATTACHMENT B

SAMPLE FORMS

1. Notice – Expected Service Disruption
2. Notice – Unexpected Service Disruption
3. Complaint / Suggestion form
4. Alternate Format Request Form
5. Acknowledgement of Training Form
6. “Talk about Disabilities: Choose the Right Word”
7. “Understanding the Universal Symbols of Accessibility”