

# Integrated Accessible Customer Service Policy And Multi-Year Accessibility Plan

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## 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 Gage Group of Companies shall follow the principles of dignity, independence, integration and equal opportunity.

## Scope

- a) This policy applies to Gage Group of Companies premises that provide Customer Service.
- b) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the services that take place at Gage Group of Companies premises.
- c) This policy shall also apply to all persons who participate in the development of the policies, practices and procedures governing the provision of providing services to members of the public or third parties as apply to Gage Group of Companies premises.
- d) Gage Group of Companies has developed a Multi-Year Accessibility Plan to identify action items that will ensure compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*. This Multi-Year Accessibility Plan shall be reviewed annually along with this Policy to ensure compliance and allocation of resources as may be required.

## 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.

## General Principles

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

Gage Group of Companies 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 as apply to Gage Group of Companies premises 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.
- in the event that Gage Group of Companies were to redevelop their Corporate website, Accessible considerations will be addressed ensure compliance at minimum to Web Content Accessibility Guidelines (WCAG) - Level A.
- Gage Group of Companies will accommodate any persons with disabilities during the recruitment and selection process. If a job applicant requests an accommodation, Gage Group of Companies will consult with the applicants and make appropriate accommodations that best suit their needs.

## B. Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing services as apply to Gage Group of Companies premises.

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 including meeting at a neutral and mutually accessible location.

## C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to Gage Group of Companies 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.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Gage Group of Companies will make all reasonable efforts to meet the needs of all individuals.

## D. Support Persons

If a customer with a disability is accompanied by a support person, Gage Group of Companies 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.

## 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 Gage Group of Companies (ie. inclement weather or mechanical malfunctions). In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Gage Group of Companies 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 an advanced notice of disruption can be provided and a notification is 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
- a description of alternative services or options

### Notifications Options:

When disruptions occur Gage Group of Companies 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 customers with appointments;
- verbally notifying customers when they are making an appointment; or
- by any other method that may be reasonable under the circumstances.

## F. Feedback Process

Gage Group of Companies 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 written or verbal means. Customers with disabilities can provide feedback as follows.

- Phone Number
- Mailing Address
- Email Address

Customers who wish to provide feedback can do so as listed above. 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 Gage Group of Companies employees based on facility premises who deal with the public or other third parties that act on behalf of Gage Group of Companies will be

provided appropriate Accessibility training; for example: sales, dispatch, customer services.

- those who are involved in the development and approval of customer service policies, practices and procedure.
- All Gage Group of Companies employees will be provided appropriate training on Ontario Human Rights Code, 1990.

#### 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.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- Gage Group of Companies policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

#### Training Schedule:

Gage Group of Companies will provide training as soon as practicable. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

#### Record of Training:

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

#### Referenced Documents:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990

## Multi-Year Accessibility Plan

Target Objectives	Action/ Goal	Deadline For Completion	Responsibilities
1. Accessibility Reports to be reviewed, updated, and filed every 3 years.	Develop and review the AODA Plans to update current status and ongoing requirements for accessibilities – File Report Online.	January 1, 2014	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
2. New Public websites and web content on those sites must conform with Web Content Accessibility Guidelines (WCAG) - Level A	If and when the corporate website is revised, Work with Website designer to make applicable and appropriate changes to satisfy our Accessibility Policy.	January 1, 2014	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
3. Train all employees/contract workers/volunteers on Human Rights Code	Develop and incorporate these training needs as part of orientation for new employees.	January 1, 2015	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
4. Develop ongoing review process to define and implemented the Multi-Year Plan.	File initial report, and develop a process for regular annual review of progress, and filing of report.	January 1, 2015	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
5. Develop processes for receiving and responding to feedback	Human Resources and Relevant Committee to review and develop a process.	January 1, 2015	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
6. Ensure applicants who require accommodation during the recruitment phase are provided with appropriate accommodation if applicable.	Human Resources and Relevant Committee to review and develop a process.	January 1, 2016	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
7. Create a written process for developing and documenting individual accommodation plans with employees with disabilities	Human Resources and Relevant Committee to review and develop a process.	January 1, 2016	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
8. Create individual accommodation plans for any existing employees with disabilities	Human Resources and Relevant Committee to review and develop a accommodation plan.	January 1, 2016	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
9. Create Return to Work (RTW) processes for employees absent due to disability who require accommodations to return	Human Resources and Relevant Committee to review and develop a process.	January 1, 2016	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>
10. Take Steps to identify and remove barriers to physical spaces for employees and general public	Initiate/Review Need For: <ul style="list-style-type: none"> <li>• Install automatic door openers for public entrance</li> <li>• Repair walkway ramp for easy access - remove curbs</li> <li>• Install automatic door openers on mail floor washroom</li> <li>• Customize main floor washroom</li> </ul> <b><i>(above bullets are examples only)</i></b>	January 1, 2017	<ul style="list-style-type: none"> <li>• Christian Salazar</li> </ul>