

P31 – CALA Accessibility Standards for Customer
Service Policy
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1. 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 the Canadian Association for Laboratory Accreditation Inc. (CALA) shall follow the principles of dignity, independence, integration and equal opportunity.

2. Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by CALA.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of CALA, including when the provision of goods and services occurs off the premises of CALA such as in: delivery services, call centers, vendors, drivers, catering and third party marketing agencies.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by CALA.
- d) This policy shall also apply to all persons who participate in the development of CALA's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

3. 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.

4. 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

CALA 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. 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 CALA.

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.

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 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.

Food Service Areas:

A customer with a disability that is accompanied by guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) CALA 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, labelling, 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 pitbulls) 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, CALA 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 times.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, CALA 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, CALA 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 CALA 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 CALA will ensure that notice is given in advance by posting notice of admission fees for support persons where CALA 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 CALA. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use CALA'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
- a description of alternative services or options

Notifications Options:

When disruptions occur CALA 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 CALA's website;
- 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

CALA 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 on the CALA website. 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:

C. Brimley, President and CEO
 310-1565 Carling Ave
 Ottawa, ON K1Z 8R1
 cbrimley@cala.ca

Customers who wish to provide feedback by completing an onsite customer feedback form (form F03) or verbally can do so to any CALA employee. 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:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of CALA; for example: assessors and training consultants; and,
- b) 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.
- CALA's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

CALA 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 as part of orientation to the organization. Revised training will be provided in the event of changes to legislation, procedures and/or practices for assessors during biennial training events. Employees will receive training as needed.

Record of Training:

CALA will keep a record of training that includes the dates training was provided and the names of employees/volunteers who attended the training.

Notice of Availability and Format of Documents

CALA 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/or operated by CALA, the CALA website and/or any other reasonable method.

5. Administration

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

- Brenda Dashney, CFO
- 310-1565 Carling Avenue
- Ottawa, ON K1Z 8R1
- bdashney@cala.ca

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

6. Non-Compliance

Failure to comply with this policy may result in disciplinary action up to and including termination.

7. Acknowledgement and Agreement

All employees, volunteers and contractors delivering services on CALA's behalf will be required to provide an acknowledgement and agreement similar to that which follows.

I, (Employee Name), acknowledge that I have read and understand the CALA Accessibility Standards for Customer Service Policy. Further, I agree to adhere to this Policy and will ensure that employees, volunteers and contractors working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Signature: _____

Date: _____

Name: _____

8. 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
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990

A1. Acceptable Terms for Use When Talking About Disabilities

The Following is an excerpt from the Ministry of Community and Social Services [http://www.mcsc.gov.on.ca/mcss/english/how/howto_choose.htm]

Words can influence and reinforce the public's perception of people with disabilities. They can create either a positive view of people with disabilities or an indifferent, negative depiction.

Here are some general tips that can help make your communication and interactions with or about people with all types of disabilities more successful.

- Use *disability* or *disabled*, not *handicap* or *handicapped*.
- Never use terms such as *retarded*, *dumb*, *psycho*, *moron* or *crippled*. These words are very demeaning and disrespectful to people with disabilities.
- Remember to put people first. It is proper to say *person with a disability*, rather than *disabled person*.
- If you don't know someone or if you are not familiar with the disability, it's better to wait until the individual describes his/her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and your assumptions may be wrong.

A2. Best Practices and Procedures

Accessible Customer Service follows four basic principles:

- Dignity
- Independence
- Integration
- Equal Opportunity

What can I do to help people with disabilities access our services?

- Ask how you can help
- Offer a variety of methods of communication
- Understand the nature and scope of the service you offer

Providing Customer Service for Persons with Disabilities

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

Best practices and procedures for Customer Service:

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.

- 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 a person's personal space, don't touch, move or lean on them
- Provide your customer information about accessible features of the immediate environment (automatic doors, accessible washrooms, etc.)
- Keep ramps and corridors free of clutter
- If a counter is too high or wide, step around it to provide service
- Provide seating for those that cannot stand in line
- Be Patient. Customers will identify their needs to you.

Hearing – 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:

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

Best practices and procedures for Customer Service:

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.

- Attract the customer's attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand
- Always ask how you can help. Don't shout. Speak clearly
- Be clear and precise when giving directions, and repeat or rephrase if necessary. Make sure you have been understood
- Face the person and keep your hands and other objects away from your face and mouth
- Deaf people may use a sign language interpreter to communicate- always direct your attention to the Deaf person -not the interpreter
- Any personal (e.g. financial) matters should be discussed in a private room to avoid other people overhearing

- If the person uses a hearing aid, try to speak in an area with few competing sounds
- If necessary, write notes back and forth to share information
- Don't touch service animals - they are working and have to pay attention at all times

Deaf - Blindness - 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.

Best practices and procedures for Customer Service:

Most people who are deaf-blind will be accompanied by an intervener, a professional who helps with communicating.

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.

- 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.
- 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
- Never touch a person who is deaf-blind suddenly or without permission unless it's an emergency
- Understand that communication can take some time- be patient.
- Direct your attention to your customer, not the Intervener.

Vision - 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.

Vision loss may result in:

- Difficulty reading or seeing faces
- Difficulty maneuvering in unfamiliar places
- Inability to differentiate colours or distances
- A narrow field of vision
- The need for bright light, or contrast
- Night blindness

Best practices and procedures for Customer Service:

Vision disabilities may 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 a vision disability, while others may use a guide dog and/or white cane.

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

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

A person with an intellectual disorder may have difficulty with:

- Understanding spoken and written information
- Conceptual information
- Perception of sensory information
- Memory

Best practices and procedures for Customer Service:

People with intellectual or developmental disabilities may have difficulty doing many things that 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.

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

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

Speech - Speech disabilities involve the partial or total loss of the ability to speak.

Typical disabilities include problems with:

- Pronunciation
- Pitch and loudness
- Hoarseness or breathiness
- Stuttering or slurring

Best practices and procedures for Customer Service:

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 oneself or understand written or spoken language. Some people who have severe difficulties may use communication boards or other assistive devices.

- Where possible, communicate in a quiet environment
- Give the person your full attention. Don't interrupt or finish their sentences.
- Ask them to repeat as necessary, or to write their message.
- If you are able, ask questions that can be answered 'yes' or 'no'
- Verify your understanding
- Patience, respect and willingness to find a way to communicate are your best tools

Learning - Learning disabilities include a range of disorders that affect verbal and non-verbal information acquisition, retention, understanding and processing. People with a learning disability may have average or above average intelligence, but take in and process information and express knowledge in different ways.

Learning disabilities may result in difficulties with:

- Reading
- Problem solving
- Time management
- Way finding
- Processing information.

Best practices and procedures for Customer Service:

- Learning disabilities are generally invisible and ability to function varies greatly
- Respond to any requests for verbal information, assistance in filling in forms, etc. with courtesy.
- Allow extra time to complete tasks if necessary.

Mental Health - Mental Health disabilities include a range of disorders, however there are three main types of mental health disability:

- Anxiety
- Mood
- Behavioral

People with mental health disabilities may seem edgy or irritated, act aggressively, be perceived as pushy or abrupt, be unable to make a decision, start laughing or get angry for no apparent reason.

Best practices and procedures for Customer Service:

- 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.
- Try to reduce stress and anxiety in situations.
- Stay calm and courteous, even if the customer exhibits unusual behavior, focus on the service they need and how you can help.

Smell - Smell disabilities can involve the inability to sense smells or a hypersensitivity to odors and smells. A person with a smelling disability may have allergies to certain odors, scents or chemicals or may be unable to identify dangerous gases, smoke, fumes and spoiled food.

Touch - Touch/ Tactile 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

Taste - 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.

Other - Other disabilities may 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.

Disabilities are not always visible or easy to distinguish.