



## **ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT**

<b>Effective Date:</b>	01-01-12	<b>OPERATIONS</b>
<b>Revised Date:</b>	06-07-16 03-22-17	<b>POLICY # O-A-1</b>
<b>Reviewed By:</b>	Management	

### **A. Integrated Accessibility Standards Regulation (O. Reg. 429/07)**

#### **Accessible Customer Service Policy**

##### **PURPOSE:**

Brimacombe is committed to providing excellent customer service in a manner that, as much as reasonably possible, respects an individual's dignity and independence.

The purpose of this policy is to outline the practices approved by Brimacombe in order to meet the obligations of the *Accessibility for Ontarians with Disabilities Act, 2005*, O. Reg. 429/07.

This policy aims to ensure that people with disabilities, visible or invisible, are given the same opportunity as others to obtain, use and benefit from the services offered by Brimacombe.

##### **DEFINITIONS:**

*Assistive Device:* Any device used by people with disabilities to help increase, maintain or improve how a person with a disability can function. Such devices may include, but are not limited to, wheelchairs, walkers, white canes, oxygen tanks, electronic communication devices, and automatic door openers.

*Customer:* Any person who uses the goods and services of Brimacombe.

*Disability:* As defined in the *Accessibility for Ontarians with Disabilities Act, 2005*, section 2;

(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness; (b) a condition of mental impairment or developmental disability; (c) a learning disability or a dysfunction on one or more of the processes involved in understanding or using symbols or spoken language; (d) a mental disorder, or; (e) an injury or disability for which benefits were claimed or received under the *Workplace Safety and Insurance Act, 1997*.

*Dignity:* Refers to service that is provided in a way that allows the person with a disability to maintain self-respect and the respect of others.

*Equal Opportunity:* Refers to service, which is provided in a way that allows the person with a disability access to goods, and service at the same level given to others.

*Independence:* Allows the person with a disability to do things on their own without unnecessary interference from others.

*Integration:* Refers to service that is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar manner as other customers, unless an alternate measure is necessary to enable the person with the disability to access the goods or services.

*Service Animal:* An animal is a service animal for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to help with their disability; or if the person provides a letter from a regulated health professional confirming that the person needs the animal to help with their disability.

*Support Person:* A person who assists a person with a disability with communication, mobility, personal care or medical needs as they access the services of the Brimacombe.

## **GUIDELINES:**

1. Brimacombe operates in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of services to persons with disabilities and others must be integrated, unless an alternate measure is necessary, to enable a person with a disability to obtain, use or benefit from services.
3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods and services provided by Brimacombe.

Reasonable efforts will be made to ensure that services provided by Brimacombe are provided in a way that allows a person with a disability to maintain self-respect and the respect of others while allowing them to do things on their own without unnecessary help or interference from others, as long as this does not present a safety risk.

In particular, Brimacombe will use reasonable efforts in the following areas:

***i. Communication***

Brimacombe will communicate to people with disabilities in ways that take into account their disability.

We will train our employees and volunteers on how to interact and communicate with our diverse community and people with diverse disabilities.

***ii. Telephone Services***

Brimacombe is committed to providing fully accessible telephone service to all customers.

We will train our employees and volunteers to communicate over the telephone in plain language and to speak clearly.

***iii. Assistive Devices***

Brimacombe is committed to providing service to people with diverse disabilities who use assistive devices to obtain, use or benefit from our services.

We will ensure that our employees and volunteers are aware and trained in the use of the various assistive devices provided by Brimacombe, for customers with disabilities while accessing our services.

***iv. Billing***

Brimacombe is committed to providing accessible invoices to our customers. For this reason, invoices will be provided in alternative formats, upon request.

***v. Use of Service Animals***

If a person with a disability is accompanied by a service animal, Brimacombe will ensure that the person is permitted to keep the animal with them, unless the animal is otherwise excluded by law from the premises. While visiting Brimacombe, it is the responsibility of the person with a service animal to control the animal at all times.

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

***vi. Use of a Support Person***

If a support person accompanies a person with a disability, Brimacombe will ensure that both persons are allowed to be together and that the person with a disability is not prevented from having access to the support person while on the premises.

## **NOTICE OF TEMPORARY DISRUPTION**

Brimacombe will make reasonable effort to provide customers with notice in the event of a disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available. We will not be able to give adequate notice in case of an emergency temporary disruption.

In order to make information accessible, signs and printed notices of sufficient size shall be prepared.

The signs and printed notices will be displayed prominently at the entrance to the applicable buildings, on notice boards and at service desks.

Telephone messages will be left in clear and concise language.

## **TRAINING FOR EMPLOYEES AND VOLUNTEERS**

Brimacombe will ensure that all persons to whom this policy applies receive training as required by the Accessibility Standards for Customer Service Regulation. Training will be provided to employees and volunteers as part of orientation training. Training will be provided to each person as soon as practicable after they are assigned to relevant duties. Training will also be provided on an ongoing basis about changes to the policies and procedures governing the provision of goods and services to persons with disabilities.

Training records for employees will be maintained in their individual employee file through Push Operations.

## **B. Integrated Accessibility Standards (O. Reg. 191/11)**

### **PURPOSE:**

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications and employment.

### **ACCESSIBILITY PLAN:**

Brimacombe will develop, maintain and document an Accessibility Plan outlining Brimacombe's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Accessibility Plan will be reviewed and updated at least once every five years. Upon request, Brimacombe will provide a copy of the Accessibility Plan in an accessible format.

## **TRAINING EMPLOYEES AND VOLUNTEERS**

Brimacombe will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities. The training will be appropriate to the duties of the employees, volunteers and other representatives of Brimacombe.

Employees and volunteers will be trained when changes are made to the accessibility policy. New employees and volunteers will be trained when hired.

## **INFORMATION AND COMMUNICATION**

### **Feedback**

Brimacombe will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication supports upon request. Brimacombe will notify guests about the availability of accessible formats and communication supports.

### **Accessible Formats and Communication Supports**

Brimacombe will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities as follows:

- In a timely manner that takes into account the person's accessibility needs due to a disability.
- At a cost that is no more than the regular cost charged to other persons.
- By consulting with the person making the request to determine suitability of an accessible format or communication support.
- By notifying the public about the availability of accessible formats and communication supports.

## **EMPLOYMENT STANDARDS**

### **Recruitment**

Brimacombe will notify employees and the public about the availability of accommodations for applicants and employees with disabilities as follows:

In the recruitment process:

- During the recruitment process, when job applicants are individually selected to

participate in an assessment or selection process.

- If a selected applicant requests an accommodation, Brimacombe will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.
- When making offers of employment to a successful applicant.

## **WORKPLACE EMERGENCY RESPONSE INFORMATION**

Brimacombe shall provide individualized workplace emergency response information to employees who have a disability in accordance with the following elements:

- If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.
- If the employee who receives an individual workplace emergency response information requires assistance, and with the employee's consent, Brimacombe shall provide the workplace emergency information to the person designated by Brimacombe to provide assistance to the employee.
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability.
- Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed, and when Brimacombe reviews its general emergency response policies.

## **DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS (IAP)**

Brimacombe will develop and have in place a written process for developing a documented individual accommodation plan for employees with a disability. The process will include the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual basis.
- The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.

- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

### **RETURN-TO-WORK PROCESSES**

Brimacombe shall have in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and shall outline the steps that Brimacombe shall take to facilitate the return to work and include an individual accommodation plan.

### **PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT AND REDEPLOYMENT**

Brimacombe shall take into account the accommodation needs and/or individual accommodation plans of employees when:

- using performance management processes
- providing career development and advancement information
- using redeployment procedures.

### **FEEDBACK PROCESS AND REQUIREMENT**

Any person wishing to provide feedback to Brimacombe about the manner in which Brimacombe provides service to people with disabilities may do so by telephone, in writing, by email, or fax, or by another method of communication.

Upon receipt of a complaint, the complaint shall be forwarded to the Guest Services Department, and the matter will be reviewed by the Manager or designate, and a response will be provided to the individual making the complaint either verbally or writing as appropriate.