
Title: Accessible Customer Service Policy

Resolution #: 056/17

Approval: Board of Directors

Program Area: Corporate Services

Issue Date: October 20, 2011

Date of Last Revision: August 17, 2017

Policy Statement:

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.

Guiding Principles:

All goods and services provided by The Otonabee Region Conservation Authority shall follow the principles of dignity, independence, integration and equal opportunity.

Application:

This policy applies to the provision of goods and services at premises owned and operated by the Otonabee Region Conservation Authority, herein referred to as Otonabee Conservation.

This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Otonabee Conservation including when the provision of goods and services occurs off the premises of Otonabee Conservation property (for example public programs, public meetings).

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 Otonabee Conservation.

This policy shall also apply to all persons who participate in the development of Otonabee Conservation's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

Procedures:

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
- I. Communication
- J. Declared Emergency

A. The Provision of Goods and Services to Persons with Disabilities

Otonabee Conservation 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 of goods and services;
- allowing customers with disabilities to do things in their own way and 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. The Use Of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Otonabee Conservation.

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.

At the request of the customer, Otonabee Conservation shall provide the person with the disability an alternative method of providing the goods or service and how they can access the alternative, temporarily or on a permanent basis.

C. The Use of 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 a 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) Otonabee Conservation 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:

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 Pitbull) 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, Otonabee Conservation may request verification from the customer.

Verification may include:

- a letter from a physician nurse practitioner, 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, Otonabee Conservation will make all reasonable efforts to meet the needs of all individuals.

D. The Use of Support Persons

If a customer with a disability is accompanied by a support person, Otonabee Conservation 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 Otonabee Conservation will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, written consent will be obtained by Otonabee Conservation from the customer, prior to the conversation taking place.

In situations where privacy and consent issues are applicable, a support person may be subject to the same confidentiality requirements as the person they are assisting. A support person may be required to sign a waiver with respect to any privacy or confidentiality issues.

Where an admission fee is charged to gain access to an event, facility or service, and the revenue from the fee is payable directly to Otonabee Conservation, the support person is permitted to attend at no cost.

For courses or training opportunities, a support person may attend at no cost, however, no certification will be granted to the support person.

E. Notice of Service Disruption

A disruption in service may occur due to reasons that may or may not be within the control or knowledge of Otonabee Conservation. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Otonabee Conservation'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, Otonabee Conservation will provide notice as soon as reasonably 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, if any, that may be available

Notifications Options:

When disruptions occur Otonabee Conservation will provide notice by:

- posting notifications in conspicuous areas including the point of disruption, the main entrance and the nearest accessible entrance to the goods or service disruption and/or on the Otonabee Conservation website and social media platform(s);
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

F. Customer Feedback

Otonabee Conservation shall provide customers with disabilities the opportunity to provide feedback on the goods and services provided. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the Otonabee Conservation website. Feedback forms, along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, submitted through the website or email), will be available upon request at physical locations where goods and services are provided and on the corporate website.

Customers can submit feedback to:

Manager, Corporate Services

Otonabee Conservation

250 Milroy Drive

Peterborough, ON K9H 7M9

Phone: (705)745-5791

Fax: (705) 745-7488

otonabee@otonabeeconservation.com

Process:

Customers who wish to provide feedback by completing a customer feedback form, or verbally, can do so to any Otonabee Conservation employee. Verbal feedback will be written down by the employee and the customer will be required to provide a signature to verify that the feedback was recorded correctly.

Customers who provide contact information will receive acknowledgement of their feedback in the same manner as it was received, along with a summary of any resulting actions based on concerns, complaints or compliments that were submitted, within 30 days.

If deemed appropriate, the concern or complaint regarding the provision of accessible goods and services may be directed to the CAO of Otonabee Conservation for recommendations on how to address the concern or complaint.

If agreement on the resolution of a complaint cannot be reached, the complainant has the option of presenting the complaint to the Authority Board of Directors for final disposition.

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 Otonabee Conservation; for example: consultants hired by Otonabee Conservation to facilitate a public meeting;
- 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 what to do if a person with a disability is having difficulty accessing ORCA services.
- Otonabee Conservation's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Otonabee Conservation will provide training to all persons to whom this policy applies as required by the AODA as soon as practical. Training will be provided to employees, volunteers, agents and/or contractors who deal with the public or act on behalf of Otonabee Conservation. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

Otonabee Conservation will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

H. Notice of Availability and Format of Documents

ORCA 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 area owned and operated by ORCA, the ORCA website (www.otonabee.com) and/or any other reasonable method.

I. Communication

Otonabee Conservation will strive to communicate with persons with disabilities in a manner that takes into account both the disability and the client's preferred method of communication.

Otonabee Conservation recognizes that not all clients will wish to communicate in the same manner. Otonabee Conservation will consult the person requesting the document to determine an appropriate accessible format of the document or information requested in accordance with the provisions of this policy. Materials that are unavailable in an appropriate format will be converted and made available in a reasonable time frame, and at the expense of Otonabee Conservation. A reasonable time frame will depend on the media chosen, the size, complexity, quality of source documents, availability of translation equipment, and number of documents to be converted.

Material printed in-house and publications produced on behalf of Otonabee Conservation should contain a note indicating “alternate formats are available upon request” and include relevant contact information.

In-house printing, where possible, should adhere to the CNIB’s Clear Print Standards or any subsequent accessible information and communication policies.

This Policy shall not apply during any period where an emergency has been declared by the Otonabee Conservation Board of Directors.

Contact:

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

Manager, Corporate Services

Otonabee Conservation

250 Milroy Drive

Peterborough, ON K9H 7M9

Phone: 705-745-5791

Fax: 705- 745-7488

Email: otonabeeeca@otonabeeconservation.com

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