Subject:	Policy No. AHR-P011	
Accessible for Ontarians with Disabilities Policy	November 6, 2014	Rev 2
Approved By:	Distribution:	
Lisette Bezner, Human Resources	All Employee Manual Holders	

# **ACCESSIBILE CUSTOMER SERVICE POLICY**

### 1.0 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 Armatec Survivability Corp. shall follow the principles of dignity, independence, integration and equal opportunity.

# 2.0 Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by Armatec Survivability Corp.
- 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 Armatec Survivability Corp., including when the provision of goods and services occurs off the premises of Armatec Survivability Corp. such as in: delivery services, vendors, drivers, 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 Armatec Survivability Corp.
- d) This policy shall also apply to all persons who participate in the development of the Armatec Survivability Corp.'s policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

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### 3.0 Definitions

<u>Assistive Device</u> – 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.

<u>Disability</u> – 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.

<u>Guide Dog</u> – 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.

<u>Service Animal</u> – 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.

<u>Service Dog</u> – 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.

<u>Support Person</u> – 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.



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# 4.0 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

Armatec Survivability Corp. 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 Armatec Survivability Corp..

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.



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### 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) Armatec Survivability Corp. 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, Armatec Survivability Corp. 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.



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# 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 time.

# Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Armatec Survivability Corp. 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, Armatec Survivability Corp. 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 Armatec Survivability Corp. 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.

## 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 Armatec Survivability Corp. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Armatec Survivability Corp.'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



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### **Notifications Options:**

When disruptions occur, Armatec Survivability Corp. 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 Armatec Survivability Corp. website;
- contacting customers with appointments; or
- by any other method that may be reasonable under the circumstances.

## F. Feedback Process

Armatec Survivability Corp. 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. 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:

Armatec HR Department 519-268-2999 ext. 8160 One Newton Ave Dorchester ON NOL 1G4 http://www.Armateconline.com HR@Armateconline.com

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to Armatec Reception

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, agents and/or contractors who deal with the public or other third parties that act on behalf of Armatec Survivability Corp.; for example: salespersons, drivers, vendors, event operators, call centers and third party marketing agents; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.



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### **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;
  - o require the assistance of a guide dog, service dog or other service animal; or
  - o 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.
- Armatec Survivability Corp.'s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

In accordance with Regulation 429/07 Accessibility standards for customer service, under the Accessibility for Ontarians with Disabilities Act, 2005, visitors are provided with an opportunity to disclose any special requirements/required accommodations during their visit, when completing the Visit Request Form (QF 63-02-1).

For further information, please refer to <u>AHS-W004 Emergency Management Plan & Evacuation Procedure</u>.

### Training Schedule:

Armatec Survivability Corp. will provide training as soon as practical and will continue to provide training in accordance with legislation. Training will be provided to new employees, agents and/or contractor who deal with the public or act on our behalf of Armatec Survivability Corp. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

#### Record of Training:

Armatec Survivability Corp. 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

Armatec Survivability Corp. 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



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in a conspicuous place owned and operated by Armatec Survivability Corp., the Armatec Survivability Corp.'s website and/or any other reasonable method

# 5.0 Administration

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

Armatec HR Department 519-268-2999 ext. 8160 One Newton Ave Dorchester ON NOL 1G4 http://www.Armateconline.com HR@Armateconline.com

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

# Referenced Documents:

- A. Accessibility for Ontarians with Disabilities Act, 2005
- B. Accessibility Standards for Customer Service, Ontario Regulation 429/07
- C. Blind Person's Rights Act, 1990
- D. Dog Owners' Liability Act, Ontario
- E. Food Safety and Quality Act 2001, Ontario Regulation 31/05
- F. Health Protection and Promotion Act, Ontario Regulation 562
- G. Ontario Human Rights Code, 1990

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# INTEGRATED ACCESSIBILITY STANDARDS REGULATION

### 1.0 Intent

This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005. This policy applies to the provision of accessible employment services for people with disabilities.

All employment services provided by Armatec Survivability Corp. shall follow the principles of dignity, independence, integration and equal opportunity.

# 2.0 Scope

This policy shall apply to every person who deals with members of the public or their agents on behalf of Armatec, whether the person is an employee, agent, volunteer or otherwise.

## 3.0 Definitions

<u>Accessible Formats</u> – include but not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

<u>Communication Supports</u> – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

<u>Conversion Ready</u> – an electronic or digital format that facilitates conversion into an acceptable format.

<u>Information</u> – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

<u>Kiosk</u> – an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one or more services or products.

Large Organization – an organization with 50 or more employees in Ontario.

<u>Mobility Aid</u> – a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device - a cane, walker or similar aid.

<u>Obligated Organization</u> – Organizations may include workplaces, businesses or services. Refers to the Government of Ontario, the Legislative Assembly, a designated public sector



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organization, a large organization and a small organization to which the standards of this Regulation apply.

<u>Performance Management</u> – activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

<u>Redeployment</u> – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

<u>Support Person</u> – in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

# 4.0 General Principles

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

- A. General Requirements
- B. Employment Standards Overview
- C. Recruitment, Assessment and Selection
- D. Accessible Formats and Communication Supports for Employees
- E. Documented Individual Accommodation Plans/Return to Work and Redeployment
- F. Plans and Processes

# A. General Requirements

General requirements that apply across all of the three standards, Information and Communications, Employment and Transportation are outlined as follows.

# Establishment of Accessibility Policies and Plans

Armatec will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. Armatec is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This should be achieved through documentation in Armatec's policies and making these documents publicly available, in an accessible format upon request.

Armatec will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. Armatec will post its accessibility plans on their website, if any, and provide the plan in an accessible format upon request. Armatec will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with



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persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement Armatec's accessibility plan and post this status on its website. If requested, the report shall be created in an accessible format.

# Procuring or Acquiring Goods and Services, or Facilities

Armatec will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

# Training Requirements

Armatec will provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code. Training will be provided for individuals who are responsible for developing Armatec's policies, and all other persons who provide, goods, services or facilities on behalf of Armatec.

# **B. Employment Standards Overview**

The Employment Standards regulation will expand Ontario's labour pool by ensuring people with disabilities are welcome and supported within all workplaces. Employment standards will assist organizations with employment recruitment, providing accessible information, plans for emergencies, individual accommodation, return to work, performance management, and career development and redeployment.

# C. Recruitment, Assessment and Selection

Armatec must notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants must be informed that these accommodations are available, upon request, for the interview process and other candidate selection methods. Armatec must notify the successful applicant of their policies and supports for accommodating people with disabilities.

# D. Accessible Formats and Communication Supports for Employees

If an employee with a disability requests it, Armatec must provide or arrange for the provision of accessible formats and communication supports for the following:

- 1. Information needed in order to perform their job; and
- 2. Information that is generally available to all employees in the workplace.

Armatec should consult with the employee making the request to determine the best way to provide the accessible format or communication support.

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# E. Documented Individual Accommodation Plans/Return to Work and Redeployment

Armatec's Return to Work process strives for an early and safe return to work. Accommodations are available for people with disabilities. Please refer to document AHR-W001 for further details.

During redeployment, Armatec will take into account the accessibility needs of its employees with disabilities. Redeployment may mean the reassignment of employees to other departments within the organization as an alternative to a "layoff", when a particular job or department has been eliminated. These standards do not apply to volunteers or other non-paid individuals.

Armatec will review and assess the existing processes to ensure that they include a method for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

The process for the development of these accommodation plans should include specific elements, such as:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or update determined, and how it should be done:
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

## F. Plans and Processes

Any department within Armatec that utilizes performance management tools, or provides career development and advancement to their employees, must respect the accessibility needs of their employees with disabilities when developing these processes. If after reviewing the Emergency Management Plan & Evacuation Procedure (AHS-W004), an employee has a disability that requires individualized workplace emergency response accommodations, they can complete an Individualized emergency response plan consent form (AHS-R068) and submit to Human resources/Health & Safety, so an individualized emergency plan can be created.

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# 5.0 Administration

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

Armatec HR Department 519-268-2999 ext. 8160 One Newton Ave Dorchester ON NOL 1G4 http://www.Armateconline.com HR@Armateconline.com

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

# **Referenced Documents:**

- A. Accessibility for Ontarians with Disabilities Act, 2005
- B. Integrated Accessibility Standards, Ontario Regulation 191/11
- C. Ministry of Community and Social Services, Making Ontario Accessible (Access ON)
- D. Ontario Human Rights Code, 1990