



Policy: AODA - Integrated Accessibility Standards Regulation (IASR) Customer Service

OBJECTIVE

This policy is intended to meet the requirements of the Customer Service Standards included in the Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005*. It 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 ECM shall follow the principles of dignity, independence, integration and equal opportunity.

SCOPE

This policy applies to:

1. All facilities owned and operated by ECM for the provision of goods and services
2. All members of ECM including managers, employees, agents, volunteers, student placements or third parties who act on behalf of ECM to interact with members of the public to provide services
3. All agencies of delivery of services and customer services representing ECM
4. All participants who develop ECM's policies, practices and procedures governing the provision of goods and services to members of the public or third party affiliates.

DEFINITIONS

AODA – Means the *Accessibility for Ontarians with Disabilities Act, 2005*

Assistive Device – Any device 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:

- a) 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



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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;

- b) A condition of mental impairment or a developmental disability;
- c) A learning disability, or dysfunction in 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 insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Service Animal – an animal is a service animal for a person with a disability if;

- a) It is readily apparent to an average person that the animal is used by the person for reasons relating to his or her medical disability ; or
- b) The person who requires the service animal can provide on request documentation from one of the following regulated health professionals confirming that the person requires a service animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario;
 - A member of the College of Occupational Therapists of Ontario;
 - A member of the College of Optometrists of Ontario;
 - A member of the College of Physicians and Surgeons of Ontario;
 - A member of the College of Physiotherapists of Ontario;
 - A member of the College of Psychologists of Ontario; or
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

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.



GUIDELINES

Core Principles

We endeavour to ensure that this Policy and related practices and procedures are consistent with the four (4) following core principles of the AODA:

Dignity: All persons, regardless of personal circumstance will be treated as a valued person deserving of full service as any other customer. This requires that no person be treated as lesser or to accept lesser quality service or a lesser experience than any other people.

Independence: All persons, regardless of personal circumstance are able to access goods and services in a way that respects their independence and are able to assert their own physical autonomy, without unnecessary assistance from others unless given the express permission of the person to do so.

Integration: Wherever possible, all persons regardless of personal disabilities will be able to access our practices, policies, goods and services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, goods and services, policies and procedures will, to the extent possible, be provided in another way or by alternative access that takes into account the person's individual needs.

Equal Opportunity: All persons, regardless of personal circumstance are given an opportunity equal to that given to any other person to obtain, use and benefit from our goods and services.

1. Communication

ECM will make every effort to communicate with persons with a disability in a manner that takes into account their respective disability and will make reasonable efforts to accommodate and offer help in ways that is appropriate. Approaches for communication including the proper use of language and terminology are set out in our accessibility training program.

ECM strives to communicate with members of the public in a manner that is accessible. Accessible communication mediums we currently use include:

- a) Our website: eliasmetal.com; and
- b) Train staff to serve a wide range of customers, including persons with disabilities.

2. The use of Assistive Devices

Persons with disabilities will be allowed to use their own personal assistive devices on our premise for the purpose of obtaining, using and benefiting from ECM's goods and services.



Exceptions may occur in circumstances where ECM determines that the assistive device may present a safety risk to the health and safety of a person with a disability or to the health and safety of others on the premises.

Where applicable, assistive devices owned and operated by ECM will be made available to assist with serving the customer's needs and requirements to access our goods and services. These devices include wheelchairs and walking canes.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

3. Use of Service Animals and Guide Dogs

Persons with disabilities who are accompanied by their guide dog or service animal are welcome in areas of the premises owned and operated by ECM and are welcome to keep the animal with them at all times in areas that are open to the public. If a service animal is excluded by law, other measures and efforts will be made to provide services to the person with a disability.

If it is not reasonably apparent that the animal is a service animal, ECM may request from the customer a letter from a health care professional that the person requires the animal for reasons related to his or her disability.

It should be noted that the service animal will be treated as a working animal and not as pets while on our premise and the person with a disability who is accompanied by a service animal must maintain care and control of the animal at all times.

4. The Use of Support Persons

If a customer with a disability is accompanied by a support person, ECM 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.

ECM may require a person with a disability to be accompanied by a support person while on our premises in situations where it is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises.

Where admission fees are charged, ECM will provide notice ahead of time on what admission, if any, would be charged. For a support person of a person with a disability ECM will waive entry fees for them at the ECM sponsored events, training etc.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation to be discussed.



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5. Notice of Temporary Disruptions in Services and Facilities

In the event of a planned or unexpected temporary disruption to services or facilities which are utilized by members of the public, ECM will notify customers promptly. Notice of temporary disruptions of services and facilities will be clearly posted and will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Notice of temporary disruptions will be posted;

- On our website (www.eliasmetal.com)
- On our social media pages, eg. Twitter, LinkedIn;
- On the front lobby area at the front entrance of our facility; and
- In conspicuous areas on our premises.

Where possible, such notices will be made in advance. ECM considers that not everyone may be able to read written notices. In an event where there is a service disruption, ECM will determine other ways to provide notice, such as having staff verbally let customers know about service disruptions.

6. Training for Staff

ECM will provide training to employees who deal with the public or other third parties on our behalf. This training will also be included in the initial employee orientation.

Training topics will include:

- An overview of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard;
- A review of this Policy and related practices and procedures;
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- What to do in a situation where a person with a disability is having difficulty accessing EMC's premises, goods or services;
- Information will be made available in forms of fact sheets and/or online media resources.

Training will be provided to all persons to whom this policy applies as soon as practicable. Staff will also be trained when changes are made to this plan and will always have internal access to training documents in the company's public drive computer files as well as through notice board postings within ECM's facility.



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Training records of this section shall be kept in ECM's training files which will include the dates on which the training is provided and the names of the individuals to whom it is provided.

7. Feedback process

Customers who wish to provide feedback on how ECM provides goods and services to customers with disabilities can contact the human resources department directly. ECM respects the privacy and confidentiality nature of all feedback which will be reviewed for possible actions that can be taken to improve ECM services.

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any employee. Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Customers can expect to hear back within 30 working days from the initial date of inquiry. Feedback and/or responses will be delivered in a format that is accessible to the complainant. By default, feedback will be provided in the format it is received unless otherwise requested. The HR representative will be responsible for receiving feedback via the following methods;

Mail to Physical address: 625 Millway Avenue Concord, ON L4K 3T9

Telephone: 905-761-5577 x 228

Toll Free: 1-888-596-7773

Fax: 905-761-5496

Email: info@eliasmetal.com

ECM website: <http://www.eliasmetal.com>

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures and will be updated accordingly.