

## Accessible Customer Service Policies and Plans

### Accessible Customer Service Policy

#### 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 company shall follow the principles of dignity, independence, integration and equal opportunity.

#### Scope

- A) This policy applies to the provision of goods and services at premises owned and operated by the company.
- 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 the company.
- 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 the company.
- D) This policy applies to all persons who participate in the development of the company's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

#### Definitions

**Assistive Device** - 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** – 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.

### **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**

The company 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**

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

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, tables that are easily accessible will be made available based on the availability of seats.

**C. Guide Dogs, Service Animals and Service Dogs**

A customer with a disability that is accompanied by a 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) the company 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 Law**

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 and/or a Service Dog**

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, the company 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, the company 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, the company 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.

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**

The company does not charge fees to any persons for admission to its premises which are open to the public. In the case of a special event or private function where minimums are applied, all applicable charges will apply to support persons. Normal charges for goods and services supplied will also apply to support persons.

**E. Notice of Disruption in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the company. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the company'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.

In the event that a notification needs to be posted in the workplace, 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

**Notification Options**

When disruptions occur, the company 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 company's website
- contacting customers with reservations;
- verbally notifying customers when they are making a reservation; or
- by any other method that may be reasonable under the circumstances.

**F. Feedback Process**

The company 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. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, or email), is available upon request.

**Submitting Feedback**

Customers can submit feedback to:

- Human Resources 128 Sterling Road, Suite 1, Toronto, ON M6R 2B7, 416-504-2266

Customers who wish to provide written feedback at any of our locations may do so by requesting a customer feedback form from their server or hostess or, if verbally, to the manager on duty.

Customers who provide formal feedback and their contact information will receive acknowledgement of their feedback within five business days, along with appropriate information about any resulting actions based on concerns or complaints.

Customers who wish to provide feedback by any other method (e.g. by telephone, email, diskettes or otherwise) are welcome to do so and every effort will be made to communicate in a format that is accessible to them at no extra cost.

**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 the company; and
- B) those who are involved in the development and approval of customer service policies, practices and procedures.

New employees who deal with the public will be provided with Accessibility training as part of their first two-week period of orientation and onboard training and testing.

**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 our services.
- The company's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

**Training Schedule**

The company will provide training as soon as practicable. Training will be provided to new employees, who deal with the public or act on our behalf as part of the orientation and training the company provides during the probationary period of employment. Training updates will also be provided in the event of changes to legislation, procedures and/or practices.

**Record of Training**

The company 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**

The company shall notify customers that the documents related to the Accessibility Standards for Customer Service are available upon request and every effort will be made to provide the information in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place on the company's website under the Accessibility Tab.

The company will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

In addition, the company, upon request, will provide emergency procedures, plans or public safety information, in a format that takes into account the customer's disability, within a reasonable timeline.

**Administration**

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

Human Resources

Gruppo Terroni Head Office

128 Sterling Road, Suite 1

Toronto, Ontario M6R 2B7

T: 416-504-2266

F: 416-203-6265

Email: [suzanne@terroni.com](mailto:suzanne@terroni.com)

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

**Reference Documents**

Accessibility for Ontarians with Disabilities Act, 2005

Accessibility Standards for Customer Service, Ontario Regulation 429/07

Blind Person's Rights Act, 1990

Dog Owner's Liability Act, Ontario

Food Safety and Quality Act 2001, Ontario Regulation 31/05

Health Promotion and Protection Act, Ontario Regulation 562

Ontario Human Rights Code, 1990