

POLICY

Customer Service Accessibility Policy

Policy #: OC-002.02

Policy Approval Level: Executive Committee

Policy Category: Corporate-Mandatory

Policy Subject: Other Corporate

Policy Sponsor: VP, HR and Chief, Knowledge Services

Lead Developer: Director, Knowledge Exchange and Communications and Executive Director, HR

Reference to Other Relevant Documents: *Ontario Human Rights Code, Accessibility for Ontarians with Disabilities Act, 2005, (AODA), Accessibility Standards for Customer Service, Ontario Regulation (O.Reg.) 429/07*

Original Approval Date: 24 February 2010

Current Version Approval Date: 3 March 2015

Year of Next Scheduled Review: 2018

Policy Applies to: Board Members Employees Students/Trainees Secondees

1 Purpose

The Ontario Agency for Health Protection and Promotion operating as Public Health Ontario (PHO) is committed to excellence in serving all members of the public, including people with disabilities.

This policy and its associated procedures, practices and organizational actions and activities demonstrate the organization's commitment to the full implementation of the Accessibility Standards for Customer Service, O. Reg. 429/07, under the Accessibility for Ontarians with Disabilities Act (AODA).

2 Scope

This policy covers all services and goods provided by PHO directly or indirectly (through third party service providers) to customers, clients and any member of the public.

This policy applies to all persons engaged by PHO in the provision of goods and services to the public, including third party service providers.

AODA Section 38 outlines how any conflicts between AODA and other legislation should be handled.

AODA Section 38

If a provision of this Act, of an accessibility standard or of any other regulation conflicts with a provision of any other Act or regulation, the provision that provides the highest level of accessibility for persons with disabilities with respect to goods, services, facilities, employment, accommodation, buildings, structures or premises shall prevail.

3 Principles

PHO is committed to service excellence and to providing its goods and services to all members of the public in a fair, equitable and respectful manner in compliance with O. Reg. 429/07 (Accessibility Standards for Customer Service).

This policy aligns directly with the principles set out in O. Reg. 429/07 (Accessibility Standards for Customer Service), namely serving all members of the public with dignity and respect, and:

- recognizing individual independence;
- providing integrated services, except when alternate measures are necessary to meet individual needs;
- ensuring equitable services and access to all Ontarians; and
- making every effort to accommodate individual needs in the provision and access to our services.

4 Definitions

Annual Compliance Report: A report that demonstrates PHO's compliance with the regulations as set out under O. Reg. 429/07 (Accessibility Standards for Customer Service). This Regulation requires PHO to submit the report annually, at fiscal year-end, to the Accessibility Directorate of Ontario.

Disability: This policy uses the same definition as the *AODA* and the *Ontario Human Rights Code*.

AODA Section 2. In this Act, "disability" means,

- (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 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 a 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*;

Employee: A member of PHO staff who is on PHO payroll, regardless of whether the employee is full-time, part-time, permanent or temporary.

Goods: Any goods provided by PHO directly or indirectly to any member of the public. Examples include educational materials and press releases.

Interaction: Any interaction between a PHO employee (or third party service providers working on behalf of PHO) with any member of the public through any medium. Examples include telephone, in person and website.

Public: Any person not employed directly or indirectly with PHO, including members of the general public, clients, customers, stakeholders, etc.

Services: Any services provided by PHO directly or indirectly to any member of the public (e.g., educational conferences for health professionals); and to requests from the public related to those services, (e.g., completion of forms and requisition requests by customers).

Third Party Service Providers: Companies or individuals, including government employees, which have been retained by PHO to provide ongoing or one-time goods or services to PHO.

5 Content

In fulfilling its mission, PHO strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. PHO is also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers. PHO will strive to accommodate the use of any personal assistive devices used by persons with disabilities, and upon request, to the best of its abilities. PHO will provide any documentation requested in a format and medium that meets the needs of the individual.

5.1 PROVIDING GOODS AND SERVICES TO PEOPLE WITH DISABILITIES

PHO is committed to excellence in serving all customers including people with disabilities and to carrying out its functions and responsibilities in the following areas:

- Educational services including conferences, seminars, workshops, meetings and other professional educational / informational events;
- Provision of educational materials and reports; Provision of water testing services; and
- Provision of laboratory services.

COMMUNICATIONS

PHO will communicate with people with disabilities in ways that take into account their disability. Employees who communicate with or have interactions with the public will be trained on how to interact and communicate with people with various types of disabilities.

TELEPHONE SERVICES

PHO is committed to providing fully accessible telephone service to all members of the public. PHO will train employees to communicate with the public over the telephone in clear and plain language and to speak clearly and slowly.

Alternate means and formats of communications with the public will be offered, including but not limited to, email, large print screen and other enablers, if telephone communication is not suitable to their communication needs or is not available.

ASSISTIVE DEVICES

PHO is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from its goods and services. PHO will ensure that its employees are able to identify various assistive devices that may be used by persons with disabilities while accessing its services.

PHO will also ensure that employees will be able to help, if so requested, with assistive devices used by persons with disabilities while accessing its services. Employees will always ask before assuming help is needed.

PROFESSIONAL AND EDUCATIONAL EVENTS

PHO is committed to serving people with disabilities who wish to attend any events and activities sponsored, organized or managed directly or indirectly, through third party providers, by PHO.

PHO will make every reasonable effort to accommodate the use of any personal assistive devices and to provide accommodation if possible; PHO has the capacity to provide information in alternative formats and will endeavor to provide information and data in a format that meets individual needs. PHO will ensure that any venues used are accessible to all members of the public and that signage and facilities are also accessible and are clearly marked.

PHO will ensure that all communication activities and products related to any PHO event that is attended by any member of the public will be accessible and PHO has the capability to make materials available through multiple formats and media. For example, a conference website will be designed to accommodate assistive technologies and software; a conference brochure will be available in different formats upon request (large print); communication vehicles will specify that the event is inclusive and that persons may call to discuss and request particular accommodation needs. PHO will make every reasonable effort to accommodate their request and will work with the individual to reach a satisfactory solution.

PHO will ensure that employees involved in the design and delivery of event planning and services will receive training in serving the needs of people with disabilities.

REPORTS AND LEARNING MATERIALS

PHO is committed to providing the goods produced (e.g. reports, learning materials) in formats and media that address the needs of people with disabilities. Upon request, PHO will make every reasonable effort to provide documents and other goods in formats and media that meet the individual needs of

persons with disabilities. PHO has the capacity to provide documents in a variety of formats and media, and the enabling technology that permits the use of personal assistive devices.

LABORATORY SERVICES

PHO is committed to serving people with disabilities who have a service request or query at any of PHO's public health laboratories (PHOL).

PHO will ensure that PHOL employees and management, who interact with the public, are trained in how to communicate and serve people with disabilities.

THIRD PARTY SERVICE PROVIDERS

PHO will ensure that third party service providers who are procured by PHO and who interact with the public comply with AODA standards on behalf of PHO. For example, PHO will ensure they receive training in how to communicate and serve people with disabilities.

PHO FACILITIES

PHO will ensure that all its facilities are accessible to all members of the public, including the exterior and the interior spaces accessed by the public as well as signage.

5.2. USE OF SERVICE ANIMALS AND SUPPORT PERSONS

PHO is committed to welcoming people with disabilities who are accompanied by a service animal in the parts of its facilities that are open to the public. PHO will also ensure that all employees and third party service providers dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

PHO is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter, together with his or her support person, those parts of the PHO's facilities that are open to the public. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on PHO premises that are open to the public.

Fees will not be charged for support persons for admission to any event that is organized by or on behalf of PHO. The public (clients, customers, stakeholders) will be informed of this by a notice that will be posted on PHO's general website, in PHO premises that are open to the public and on any event communiqués, such as conference brochures.

5.3. NOTICE OF TEMPORARY DISRUPTION

PHO will provide the public with notice in the event of a planned or unexpected disruption in the facilities or services usually used, or that may be used, by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, contact information, and a description of alternative facilities or services, if available. The notice will be placed in convenient and visible location(s), and, if appropriate, will also be published on the PHO web site.

5.4. TRAINING FOR EMPLOYEES

PHO will provide training on serving people with disabilities to all employees who deal with the public on PHO's behalf, and will ensure that third party service providers understand and can demonstrate

their ability to comply with AODA standards through applicable procurement processes, including providing proof of training should it be required for the service being provided. Any positions identified as developing, and/or designing, and/or implementing policies related to the provision of services to the public, or in providing services to the public as part of their ongoing duties, will be trained.

This training will be provided as soon as practicable after such employees commence their duties, and will not be beyond two months from the start date. Training for serving persons with disabilities will be included in the orientation process. Employees will also be trained on an ongoing basis when changes are made to customer service policies, practices and procedures.

Training will include the following, as applicable to a person's role:

- The purposes of the AODA and the requirements of the customer service standards.
- 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.
- How to use assistive devices that PHO provides.
- What to do if a person with a disability is having difficulty in accessing PHO's services and/or facilities.
- PHO's policies, practices and procedures relating to the customer service standards.

PHO will keep a record of all training provided under the AODA and O. Reg. 429/07 (Accessibility Standards for Customer Service), including the dates on which the training was completed.

5.5. FEEDBACK PROCESS

The ultimate goal of PHO is to meet and surpass the public's expectations while serving members of the public with disabilities. Comments on PHO services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way PHO provides services to people with disabilities can be made by email, via PHO's website, verbally in person or over the telephone, by mail, fax, or electronic text. All feedback will be directed to PHO Communications. The public can expect to hear back within ten (10) business days.

Feedback will be addressed in accordance with PHO's complaint management procedures.

5.6. QUESTIONS ABOUT THIS POLICY

This policy exists to achieve service excellence to customers and all members of the public with disabilities who wish to access our goods and services. If anyone has a question about this policy, or if the purpose of this policy is not understood, then further explanation can be requested from PHO Communications.

5.7. REPORTING REQUIREMENTS

PHO will comply with all reporting requirements as stated in the AODA and its regulations. PHO will submit an annual report demonstrating compliance with the regulation to the Accessibility Directorate of Ontario by March 31.

6 Responsibilities

CEO AND EXECUTIVES

- Approve the annual compliance report to be submitted to the Accessibility Directorate of Ontario (ADO) on PHO's compliance with the O. Reg. 429/07 (Accessibility Standards for Customer Service).

MANAGERS

- Ensure that policies are developed and programs designed using an "accessibility lens".
- When contracting with third party service providers to provide PHO goods and services, ensure that the third party service provider complies with AODA standards defined in the procurement process.
- Ensure that employees in positions identified as requiring customer service accessibility training receive the required training, including any refresher training.

HUMAN RESOURCES AND COMMUNICATIONS

- Ensure PHO communications and human resources policies and practices support and comply with this policy.
- Design PHO's AODA training and orientation program and monitor its effectiveness. Track and report training completion.

EMPLOYEES

- Be aware of and comply with the contents of this policy and related procedures and practices that are in the scope of their service responsibilities.
- Ensure that procedures and practices for which they are responsible reflect the commitments of this policy;
- Uphold the foundational principles of dignity and respect and align with the intention of the AODA and its regulations.

THIRD PARTY SERVICE PROVIDERS

- Comply with all relevant provisions contained in this policy including demonstration through the procurement process that they meet the requirements under AODA.

7 Review

This policy will be reviewed every three (3) years or earlier if deemed necessary.

8 Key Implementation Documents

- *Accessibility for Ontarians with Disabilities Act, 2005 – Ontario Regulation 429/07*
- *Accessibility Standards for Customer Service o Accessibility for Ontarians with Disabilities Act, 2005: A Comprehensive Guide for Developing Accessibility Policies and Accessibility Plans.*

In addition, the following documents are applicable to the implementation of this policy:

- Procedure for Public Events – *Customer Service Standard, AODA.*
- Procedure for Feedback Process on *Customer Service Standard, AODA.*
- Procedure and Notice of Temporary Disruptions to facilities and services used by persons with disabilities, and examples of notices for temporary disruption. o Emergency Evacuation Procedures for persons requiring assistance.
- Training and orientation program.

9 Appendices

No appendices

10 Policy Change History

Revision Number	Date of Approval	Description of Change / Actual change
OC-002.02	March 3, 2015	<p>Definitions</p> <ul style="list-style-type: none">• reordered items alphabetically• added definition for employee <p>Content</p> <ul style="list-style-type: none">• revised language for clarification• section 5.4 - elaborated on AODA• training for third party service providers <p>Responsibilities</p> <ul style="list-style-type: none">• clarified responsibilities for all positions

Public Health Ontario

Public Health Ontario is an agency of the Government of Ontario dedicated to protecting and promoting the health of all Ontarians and reducing inequities in health. Public Health Ontario links public health practitioners, front-line health workers and researchers to the best scientific intelligence and knowledge from around the world.



For more information contact: communications@oahpp.ca .