

Title: ACCESSIBLE CUSTOMER SERVICE POLICY	Policy Number: HR-0001.05
	Policy Area: HUMAN RESOURCES
Policy Approved By: DIRECTOR, HR	Effective Date: March 1, 2012

I. Purpose

To set out the RHRA’s position and procedures in providing access to the organization for persons with disabilities.

II. Definitions

Background

The Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”) is a provincial Act with the purpose of developing, implementing and mandating accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Under the AODA, Ontario Regulation 429/07, entitled “Accessibility Standards for Customer Service” (the “Regulation”) came into force on January 1, 2008. The Regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or other third parties.

General Principles

The RHRA will strive to ensure that its policies, practices and procedures are consistent with the following core principles, as outlined in the AODA:

- **Dignity** - Goods and services are provided in a manner that is respectful to persons with a disability and does not diminish the person’s importance.
- **Independence** - Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.
- **Integration** - Persons with disabilities can access all goods and services. This may require alternative formats and flexible approaches. It means inclusiveness and full participation.
- **Equal Opportunity** - Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

Components of the Policy

The AODA and its Regulation requires a minimum legal standard in program design and service delivery to persons with disabilities. They address the following components:

- The provision of goods and services to persons with disabilities;
- The use of assistive devices by persons with disabilities;
- The use of service animals by persons with disabilities;
- The use of support persons by persons with disabilities;
- Notice of temporary disruptions in services and facilities;
- Training;
- Customer feedback regarding the provision of goods and services to persons with disabilities; and
- Notice of availability and format of documents.

III. Legislative reference(s)

The Accessibility for Ontarians with Disabilities Act, 2005
The Ontario Human Rights Code

IV. Policy

The RHRA's Accessible Customer Service Policy reflects the policies, practices and procedures related to the provision of goods and services to its customers, including those customers with disabilities. It applies to members of the public, retirement home operators and staff, residents and their families, and individuals who have dealings with the RHRA.

V. Procedures

The RHRA's service delivery model to persons with disabilities addresses the following components:

1. Provision of Goods and Services to Persons with Disabilities

The RHRA aims to exceed the expectations of those it serves, including those with disabilities. The RHRA will train staff and others who act on the RHRA's behalf and who communicate with customers on how to interact and communicate with persons with various types of disabilities.

To ensure the best possible customer service, the RHRA encourages open two-way communication. Persons with disabilities should communicate their need for

accommodation or assistance if it is not readily apparent how the RHRA can meet their needs.

2. Use of Assistive Devices, Service Animals and Support Persons

- 2.1. **Assistive Devices** - The RHRA will accommodate persons with disabilities who use assistive devices to obtain, use or benefit from its goods and services. An assistive device is any device used to assist persons with disabilities in carrying out activities or in accessing the goods or services offered by the RHRA.

The RHRA will permit persons with disabilities to obtain, use or benefit from goods or services through the use of their own assistive devices. Exceptions may occur in situations where the RHRA has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises. In these situations, if a person with a disability is hindered from accessing the goods or services, the RHRA will provide an alternative accommodation where possible.

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.

- 2.2. **Service Animals** - The RHRA will facilitate access to areas of its premises that are open to the public and other third parties by persons with disabilities who are accompanied by a service animal, unless otherwise prohibited by law. The RHRA will train its staff in how to interact with persons with disabilities who are accompanied by a service animal.

On rare occasions where a service animal is to be denied access to a facility or a meeting room, the RHRA will suggest other appropriate alternatives. These alternatives might include alternate meeting formats (e.g. teleconference where technology permits), delivery of goods/services at an alternate time or location, etc.

- 2.3. **Support Persons** - The RHRA welcomes persons with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person may enter premises open to the public or other third parties with his or her support person. At no time will the RHRA prevent a person with a disability who is accompanied by a support person from having access to his or her support person while on RHRA premises.

Where there is a fee associated with participating in an RHRA event, the RHRA will permit the support person to attend at no cost. However, the support person shall be responsible for other services such as food, lodging, etc.

Space for RHRA organized events may be limited. To ensure they can be accommodated, customers must provide notice and/or provide documentation to indicate that they will require the support of a support person.

3. Notice of Temporary Disruption

The RHRA will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and service counters at RHRA premises.

If the disruption is long-term, an announcement will be made publicly available to inform all customers of the location, duration or the disruption and alternate solutions.

4. Training for Staff

The RHRA will provide ongoing customer service training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

The RHRA will provide training to staff when they commence employment with the RHRA. Training will include:

- The purposes of the AODA and the requirements of the customer service standard;
- Instruction on how to interact and communicate with persons of various types of disabilities, including with those individuals who use an assistive device or require the assistance of a service animal or a support person;
- Information to familiarize employees with personal assistive devices, including but not limited to wheelchairs, screen readers, and listening devices;
- Instruction on what to do if a person with a disability has difficulty accessing the RHRA's goods and services;
- The RHRA's policies, practices and procedures relating to the customer service standard.

In addition, the RHRA will inform staff of any changes that are made to the RHRA's policies, practices and procedures, and will be provided with the associated additional training.

5. Feedback and Questions about the Policy

The ultimate goal of the RHRA is to meet and surpass customer service expectations when serving customers with disabilities. Feedback regarding RHRA's provision of goods and services to persons with disabilities or questions about the Policy can be made by contacting the RHRA:

By telephone: 1-855-ASK-RHRA (1-855-275-7471)
By email: info@rhra.ca
By mail: Attention: Director, Human Resources
Retirement Homes Regulatory Authority
55 York Street, Suite 700
Toronto, ON M5J 1R7

The RHRA will use the feedback it receives to improve the RHRA's customer service and to assist it in achieving service excellence to customers with disabilities.

Customers can expect to receive a reply to their questions about the Policy within 10 business days of its receipt, in the format in which the request for information was received.

6. Availability and Format of Documents

The RHRA will make available, upon request and subject to applicable privacy laws, all documents that are required by the Regulation, including the Policy, notices of temporary disruptions, training records and written feedback processes. When providing these documents to a person with a disability, the RHRA will endeavour to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

7. Modifications to this or other Policies

The RHRA is committed to developing and updating customer service policies that respect and promote the dignity and independence of persons with disabilities. Any policy that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

VI. Support and Reference Documents

AODA Audit

Document Control				
Policy #	Approval Date	Review Date	Author(s)	Description of Change(s)
HR-0001.05	<i>March 1, 2012</i>	<i>December 3, 2018</i>		<i>Entered new address</i>
HR-0001.05	<i>March 1, 2012</i>	<i>June 8, 2021</i>		<i>Added Modifications to this or other Policies</i>
HR-0001.05	<i>March 1, 2012</i>	<i>September 3, 2024</i>		<i>Reviewed to align with Privacy and Access Code</i>