



April 1, 2016

Accessibility Standards for 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 (John Brooks Company Limited) 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, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company, including when the provision of goods and services occurs off Company premises.
- 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 shall also apply 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 – 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 that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading, such as a wheelchair, walker or a personal oxygen tank, etc.

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
- 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:

- 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 – 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 – in relation to a person with a disability, is 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:

1) 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
- communicating in a manner that takes into account the customer's disability.

2) The Use of 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, where elevators are not present and an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Guide Dog – is a highly trained working dog that has been trained to provide mobility, safety and increased independence for people who are blind.

3) The Use of 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.

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, 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 time.

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.

4) The Use of 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 confidential information being discussed.

5) Notice of Disruptions 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.

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

Notifications Options: When disruptions occur the Company will provide notice by:

- posting notices at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and on the website
- contacting customers with appointments - verbally notifying customers when they are making an appointment, or - by any other method that may be reasonable under the circumstances.

6) Customer 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 or written, will be available upon request.

7) Training

Training will be provided to management and employees that act on behalf of the Company.

Training Provisions:

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*.
- 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
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- The Company's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Record of Training: A record of the training will be kept for each employee.

Multi-Year Accessibility Plan

On an annual basis, the company will ask employees for feedback on ways to improve service to those with disabilities and to compose ideas on how to help prevent and remove potential future barriers. The company will develop a time line if necessary for areas where we are not compliant and include any action items with

targeted deadlines in this policy. The Health and Safety committee will also review compliancy as part of their agenda on semi-annual inspections.