

<b>NAME</b>	<b>Bethlehem Housing and Support Services</b>
<b>POLICY</b>	<b>Accessible Customer Service Policy</b>
<b>DATE</b>	November 10, 2011 approved by Board of Directors
<b>DATE REVIEWED OR REVISED</b>	Revised August 22, 2012 – approved September 6, 2012
<b>REFERENCES</b>	<p><i>Accessibility for Ontarians with Disabilities Act, 2005</i>  <i>Accessibility Standards for Customer Service, Ontario Regulation 429/07</i></p> <p><i>Consent for Presence of Support Person</i>  <i>Contractor Compliance Statement</i>  <i>Customer Service Feedback Form</i>  <i>Documentation Notice</i>  <i>Feedback Notice</i>  <i>Notice of Service Disruption</i>  <i>Request for Alternative Documentation Format</i></p>
<b>SEE ALSO</b>	<p><i>Human Rights Policy</i>  <i>Accessibility Standards for Customer Service Implementation and Training Resources Manual – published by the Ontario Government and ONPHA</i></p>

## POLICY STATEMENT

Bethlehem Housing and Support Services is committed to providing its services in ways that are accessible to everyone in keeping with the principles of dignity, equal opportunity, independence and integration.

## PURPOSE AND SCOPE

### **PURPOSE:**

The purpose of this policy is to establish guidelines on providing housing and services to people with disabilities that will facilitate accessibility. This policy establishes accessibility standards for customer service in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* and in keeping with *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.

Bethlehem Housing and Support Services will make reasonable efforts to ensure policies, practices and procedures and the delivery of housing and services provided to persons with disabilities. We will communicate with people with disabilities in ways that take into account their disability and communication needs.

### **SCOPE:**

The policy applies to all board members, employees, volunteers, contractors/third parties who represent our organization.

## DEFINITIONS AND CLARIFICATION

### DEFINITIONS:

#### **Assistive Devices**

Devices used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the customer service standard. Assistive devices include, but are not limited to wheelchairs, reading machines, recording machines, hearing devices, devices for grasping, a white cane.

#### **Barrier**

As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, procedure or a practice.

#### **Disability**

As defined by the *Accessibility for Ontarians with Disabilities Act, 2005* and the *Ontario Human Rights Code*, disability is:

- 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, 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 a 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*.

## **Service Animals**

For the purpose of this policy, a “service animal” is defined as either:

- A "guide dog," as defined in Section 1 of the *Blind Persons Rights’ Act*; or
- A "service animal" for a person with a disability.

For the purpose of this policy, 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 the 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.

## **Support Person**

For the purpose of this policy, a support person is defined as another person who accompanies a person with a disability in order to help him or her with communication, mobility, personal care or medical needs or with access to goods or services.

# **PROCEDURES**

## **1.0 ASSISTIVE DEVICES**

- People with disabilities may choose to use their own personal assistive devices, while accessing goods and services. Bethlehem Housing and Support Services acknowledges the importance of these devices and will allow people with disabilities to use their own personal assistive devices to obtain, use or benefit from the services offered by our organization, unless there is a defined risk associated with that use.
- A *Documentation Notice* will be clearly displayed throughout the building at all times to alert tenants, applicants, visitors and members of the public to the availability of the non-profit’s accessible customer service policies, practices and procedures.
- Should a person with a disability be unable to access Bethlehem’s services through the use of their own personal assistive device, by completing a *Request*

*for Alternative Documentation Format*, Bethlehem will assess service delivery and potential service options to meet the needs of the individual.

- Bethlehem staff and others who provide service to tenants/customers will be familiar with the assistive devices and other accessibility supports available that will increase the accessibility of our services to people with disabilities.

## **2.0 COMMUNICATION**

- Communication must take into account a person's disability. (Refer to the ONPHA Training Manual - Accessibility Standards and Training Resources pgs. 18 – 81 which addresses how to interact with people with various disabilities and people who may also use assistive devices, require assistance of a service animal or require the assistance of a support person, etc.)

## **3.0 SERVICE ANIMALS**

- Bethlehem acknowledges the vital relationship and dependency which exists between a person with disabilities and their service animal. Bethlehem is committed to welcoming people including visitors with disabilities who are accompanied by a service animal on the parts of the premises that are open to the public.
- Public areas of our premises include common areas such as lobby, laundry facilities, building office, community/ meeting rooms, etc. Service animals are not permitted where food preparation is being undertaken or as otherwise disallowed by law.
- The tenant/customer when accompanied by a service animal will be allowed to enter the premises with the animal and keep the animal with him or her at all times, unless the animal is excluded by law from the premises.
- If an animal is disallowed by law, reasonable alternative arrangements will be offered such as Community Support to enable a customer to have access to our goods and services.
- The tenant/customer is responsible for the care, supervision and control of their service animal while on the premises.

## **4.0 SUPPORT PERSONS**

- Bethlehem is committed to welcoming people with disabilities who are accompanied by a support person. People with disabilities have the right to have

access to their support person while accessing housing and services of Bethlehem.

- If confidential information is going to be discussed, the person with the disability should be asked if they prefer their support person to remain present. If the support person is present when confidential information is to be disclosed, signed consent must be received from the person with the disability. A signed confidentiality agreement (*Consent for Presence of Support Person*) should also be obtained from the support person.
- Bethlehem may request that a person with a disability be accompanied by a support person, in the event that it is considered necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises. This will only occur after consultation with the person with a disability and when it is the only means to allow the person with a disability to access Bethlehem's or services. The following criteria shall be used in consulting with the applicant/resident/tenant/participant:
  - a. When the risk is greater than the risk associated with other applicants/residents/tenants/participants;
  - b. When there is a clear and significant risk to the health and safety of the person with a disability or others;
  - c. When the risk cannot be eliminated or reduced by other means;
  - d. When the assessment of the risk is based on consideration of the nature and severity of the potential harm, the duration of the risk, the likelihood that the potential harm will occur and how imminent the potential risk is;
  - e. When the assessment of risk is based on the person's actual characteristics, not on perceived risk that is based on generalizations, misconceptions or fears about a disability.
- Bethlehem will not charge an admission fee in connection with a support person's presence at an event or function or for a service.

## **5.0 NOTICE OF SERVICE DISRUPTIONS**

- If there is a temporary disruption in the availability of services and facilities (e.g., temporary loss of elevator service), Bethlehem will provide a notice of the reason for the disruption, the date(s) of disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

- The *Notice of Service Disruption* may be provided by a variety of methods, depending on the circumstances, and may include postings in conspicuous places at the affected premises (postings beside the elevator doors, on public bulletin boards), as well as by other means that will ensure that the notice reaches those persons potentially affected by the temporary disruption.
- If the disruption is anticipated, a reasonable amount of advance notice of the disruption will be provided. If the disruption is unexpected, notice will be provided as soon as possible.

## 6.0 FEEDBACK

- Bethlehem is committed to providing high quality customer service and wants to continue to enhance and improve the accessibility of our customer service to our applicants, residents, tenants, participants, visitors, members of the community who use our facilities, and other members of the public with disabilities.
- A process to receive feedback on the provision of housing and services to people with disabilities accessing services at Bethlehem has been established. A *Feedback Notice* will be displayed prominently in the building to inform people on how to provide feedback either in person, by telephone, in writing, by email, online, or by another method.
- A *Customer Service Feedback Form* can be filled out online on the website ([www.bethsupporthousing.com](http://www.bethsupporthousing.com)) downloaded in accessible formats from the website, or a copy of the form can be picked up in the building office. The feedback form is available in alternate formats when requested (e.g. large print, disk, email attachment, etc.)
- Responses to feedback received are not mandatory. If a person who submits feedback requests a response and provides contact information, Bethlehem will follow-up with the individual in the format in which the feedback was received, within fifteen working days. All feedback will be kept in the strictest confidence and will be used to improve customer service.

## 7.0 TRAINING

- Bethlehem shall ensure that employees and volunteers who deal with the public on behalf of Bethlehem, and those who are involved in Bethlehem policy and

program development and/or in directing, monitoring or evaluating policies receive training on accessible customer service.

- All third party contractors who deal with the public or other third parties who represent Bethlehem shall ensure that their employees, agents, subcontractors, etc. receive training in accordance with this policy and the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*. Contractors will provide the Bethlehem Housing and Support Services with a *Contractor Compliance Statement* to that affect and, upon request, shall provide the training records to Bethlehem. If a contractor is unable to provide a Contractor Compliance Statement, a Bethlehem trained staff will remain with the contractor during the duration of the contact or have the contractor view the AODA training video and a copy of our policy, prior to the commencement of the required work.
- Training will include a review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c11* and the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, the requirements of this policy, and instruction about the following matters:
  - How to interact and communicate with people with various types of disability;
  - How to interact with people with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
  - How to use equipment or devices available on Bethlehem's premises or otherwise made available by the housing provider that may help with the delivery of housing or services to a person with a disability; and
  - What to do if a person with a particular type of disability is having difficulty accessing Bethlehem housing or services;
  - The Bethlehem policies, procedures and practices pertaining to the provision of housing and services to persons with disabilities.
- Customer service training can take various forms including as part of an orientation or as a separate training program. The training can be provided through handouts at an orientation session, in a group setting, by video or through other formats.
- Bethlehem will provide training to each person during orientation or as she/he is assigned the applicable duties. Training will also be provided on an ongoing



basis in connection with changes to applicable legislation, and/or organizational policies, procedures and practices governing the provision of housing or services to people with disabilities.

- As required, by *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, Bethlehem will log and maintain records which will record the details of the training provided, as well as the name of the person, location, and date the training was completed.