



## ACCESSIBLE CUSTOMER SERVICE POLICY

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 individuals with disabilities, not to the goods themselves.

All programs, facilities, goods and services provided by Primacare Living Solutions Inc. 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 Primacare Living Solutions Inc.
- b. This policy applies to employees, volunteers, students, agents and/or contractors who deal with the public or other third parties that act on behalf of Primacare Living Solutions Inc., including when the provision of goods and services occurs off the premises of Primacare Living Solutions Inc.
- 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 Primacare Living Solutions Inc.
- d. This policy shall also apply to all persons who participate in the development of the Primacare Living Solutions Inc.'s policies, practices and procedures governing the provision of goods and services to members of the public or third parties.
- e. This policy shall govern all employee practices for hiring and accommodation within the workplace

## 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 persons 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** – is 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 Person Service, Ontario Regulation 429/07*, this policy addresses the following:

- i. The Provision of Goods and Services to Persons with Disabilities
- ii. The Use of Assistive Devices
- iii. The Use of Guide Dogs, Service Animals and Service Dogs
- iv. The Use of Support Persons
- v. Notice of Service Disruptions
- vi. Feedback Process
- vii. Training
- viii. Notice of Availability and Format of Required Documents
- ix. Employment, Hiring and Recruitment
- x. Team Member Practices



## **XI. Organizational Practices**

### **1. The Provision of Goods and Services to Persons with Disabilities**

Primacare Living Solutions Inc. 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 persons receive the same value and quality;
- Allowing persons 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 persons with disabilities have access to the same services, in the same place and in a similar manner;
- Considering individual needs when providing goods and services; and
- Communicating in a manner that considers the person's disability.

### **2. Assistive Devices/Person's Own Assistive Device(s)**

Persons with disabilities may use their own personal assistive devices or technologies in an unrestricted manner in all areas of the residence, office, or building to which residents, family members, vendors, persons, volunteers, students, independent operators, contractors, subcontractors, or team members have access, except when subject to operator or resident safety and/or business integrity.

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 person with an oxygen tank may involve ensuring the person is in a location that would be considered safe for both the person and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the person.

### **3. Guide Dogs, Service Animals and Service Dogs**

A person 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. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

#### Food Service Areas:

A person 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) Primacare Living Solutions Inc. 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).

*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 pit bulls) 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, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the person for reasons relating to his or her disability, Primacare Living Solutions Inc. may request verification from the person.

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 person 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, Primacare Living Solutions Inc. will make all reasonable efforts to meet the needs of all individuals.

### **4. Support Persons**

If a person with a disability is accompanied by a support person, Primacare Living Solutions Inc. will ensure that both persons are allowed to enter the premises together and that the person is not prevented from having access to the support person.

There may be times where seating and availability prevent the person and support person from sitting beside each other. In these situations, Primacare Living Solutions Inc. will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the person, prior to any conversation where confidential information might be 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 Primacare Living Solutions Inc. In the event of any temporary disruptions to facilities or services that persons with disabilities rely on to access or use Primacare Living Solutions Inc.'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.



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, Primacare Living Solutions Inc. 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 Primacare Living Solutions Inc. website;
- Contacting persons as they approach or enter the home.
- Verbally notifying persons when/if they call the home; or
- By any other method that may be reasonable under the circumstances.

## **6. Feedback Process**

Primacare Living Solutions Inc. shall provide persons with disabilities with the opportunity to provide feedback on the service provided to individuals with disabilities. Information about the feedback process will be readily available to all and notice of the process will be made available in public areas of each Home. Feedback forms along with alternate methods of providing feedback such as verbally, in person or by telephone, in electronic text, on a diskette or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback:

Feedback can be submitted to:

**Matthew Melchior - President**

416-243-9019 ext. 230

[mmelchior@primacareliving.com](mailto:mmelchior@primacareliving.com)

**Primacare Living Solutions Inc.**

200 Ronson Drive, Suite 305

Toronto, ON M9W 5Z9

[www.primacareliving.com](http://www.primacareliving.com)

Visitors who wish to provide feedback by completing an onsite person feedback form or verbally can do so to any Primacare Living Solutions Inc. employee.



Persons that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

## 7. Training

Training will be provided to:

- a. All employees, volunteers, students, independent operators, contractors, or sub-contractors who deal with the public or other third parties that act on behalf of Primacare Living Solutions Inc.;
- b. Those who are involved in the development and approval of person service policies, practices and procedures.

### 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 Person Service, Ontario Regulation 429/07* and Ontario Human Rights Code.
  
- 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 your services.
- Primacare Living Solutions Inc.'s policies, procedures and practices pertaining to providing accessible person service to persons with disabilities.

### Training Schedule:

- Provide training as soon as practicable and maintain accurate training records of completion, including dates the training took place.
- Provide education to reflect any changes to practices, policies, and/or procedures.
- Use the *Accessibility for Ontarians with Disabilities Act Contractor and Independent Operator Notification template* to issue a written letter of training notification to Independent Operators, Contractors, or Sub Contractors regarding the completion of required training.



### Record of Training:

Primacare Living Solutions Inc. will keep a record of training that includes the dates training was provided and the number of persons who attended the training.

### **8. Notice of Availability and Format of Documents**

Primacare Living Solutions Inc. shall notify persons that the documents related to the Accessibility Standard for Person Service are available upon request and in a format that considers the person's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Primacare Living Solutions Inc., the Primacare Living Solutions Inc.'s website and/or any other reasonable method.

This will consider information that is needed in order to perform a team member's job and information that is generally available to team members in the workplace.

It will consider the person's accessibility needs at a cost that is no more than the regular cost charged to other persons. This does not apply to products and product labels, unconvertible information or communications, and information that the Organization does not control directly or indirectly through a contractual relationship. If it is determined that the information or communications are unconvertible, provide the person requesting the information or communication with:

- a. An explanation as to why the information or communication is unconvertible;
- b. A summary of the unconvertible information or communication.

Examples of accessible formats or communication supports: Giving a person or member of the public who has low vision information in a large print, or exchanging hand-written notes to communicate with a person or member of the public who is deaf.

Provide all existing public emergency procedures, plans, and public safety information upon request in an accessible format or with appropriate communication supports in a timely manner to persons with disabilities that considers their disability.

Provide individualized workplace emergency response information to team members, volunteers, students, independent operators, contractors, or subcontractors who have disabilities if aware of the need for accommodation and if the nature of the disability is such that individualized information is necessary. The Individualized Workplace Emergency Response Plan shall be utilized. With consent, share this information with anyone designated to help them in an emergency:

- When an individual moves to a different location in the Organization;
- When the individual's overall accommodations, needs, or plans are reviewed; and
- When the employer reviews its general emergency response policies.



## 9. Employment, Hiring and Recruitment

Refer to the Recruitment and Selection Process policy, and the Accessibility Interviewing Checklist to support candidates with disabilities during the recruitment, assessment, and selection process.

Refer to the Individual Accommodation Process and Plan to establish an individual accommodation plan for team members with disabilities, where applicable.

Refer to the Early & Safe Return to Work policies and attachments to support team members returning to work after a disability-related leave of absence, using the Individual Accommodation Plan, where applicable.

Consider accessibility needs of team members with disabilities and the Individual Accommodation Plan with respect to the performance management process.

Consider accessibility needs of team members with disabilities and the Individual Accommodation Plan with respect to the attendance management process.

Consider the accessibility needs of team members with disabilities and the Individual Accommodation Plan when providing career development and advancement opportunities.

Consider the accessibility needs of team members with disabilities and the Individual Accommodation Plan due to redeployment.

Inform new team members of policies used to support team members with disabilities; this includes policies on the provisions of job accommodations that consider a team member's accessibility needs due to disability. This information will be provided to new team members in their offer of employment letter.

Provide updated changes to team members regarding existing policies on the provisions of job accommodations that consider a team member's accessibility needs due to disability.

## 10. Team Member Practices

**Team members, volunteers, students, independent operators, contractors, and subcontractors will utilize any of the following principles as required:**

- 1) Identify, remove, or report barriers to access for people with disabilities.
- 2) Ask a person with a disability how to best help and communicate with them.
- 3) Respect the dignity of persons with disabilities.
- 4) Speak directly to the person, not the intervener or support person accompanying the person with the disability.
  - **People with hearing loss:** Attract the person's attention before speaking; ensure you are in a well-lit area where the person can see your face and read your lips; reduce background noise or move to a





quieter area; ask if another method of communicating would be easier (i.e., using a pen and paper).

- **People with vision loss/impairment:** Do not assume the individual cannot see you; identify yourself when you approach the person; ask if they would like you to read any printed material out loud to them; offer your elbow to guide them if needed, offer to expand print material.
  - **People with learning disabilities:** Provide information in a way that considers the person's disability; be patient.
  - **People with speech or language impairments:** When possible, ask questions that can be answered with "yes" or "no"; do not interrupt or finish the person's sentences; be patient.
  - **People with mental health disabilities:** Be calm and reassuring; ask them to tell you the best way to help.
  - **People with intellectual/developmental disabilities:** Use plain language; provide one piece of information at a time.
- 5) When interacting with people using personal assistive devices, such as wheelchairs, walkers, hearing aids, canes, or speech amplification devices, do not move assistive devices or equipment out of the person's reach or handle assistive devices without permission.
  - 6) Avoid touching or addressing service animals, as they are working animals who have to pay attention at all times. Team members who are unsure if the animal is a pet or service animal should ask the person.
  - 7) Where people with disabilities are accompanied by a support person (i.e., personal support worker, volunteer, family member, or friend), take your lead from the person or the person requiring your services.
  - 8) Notify Manager or designate about all accessibility requests for public emergency procedures, plans, public safety information, accessible formats, and communication supports for persons with disabilities in a timely manner.
  - 9) Request individualized workplace emergency response accommodations from Manager or designate where required, including when moving to different locations within the Organization.

## 11. Organizational Practices

### The Organization will:

- a. Establish, implement and maintain a multi-year accessibility plan. The multi-year accessibility plan will describe the specific short-term and long-term actions that the Organization will take to meet the obligations set out under the AODA and its regulations. The Accessibility Plan shall be reviewed and, if necessary, updated at least once every five (5) years.



- b. Ensure internet websites and web content are controlled directly by the Organization or through a contractual relationship that allows for modification of the product conforms with World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A initially and Level AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards Regulations.
- c. Comply with the Built Environment Standards when undertaking new construction and redevelopment of public spaces.
- d. Consider what accessibility features could be built into kiosks to best meet the needs of people with disabilities.
- e. File an accessibility compliance reports every three (3) years. Make the report available to the public and upon request in an accessible format.
- f. Ensure documents that detail the Organization's accessibility policies and procedures will be made available upon request. The Organization will make every effort to make the information available to persons with disabilities in a format that considers their disability.

Accessible Person Service Policy Inquiries Should you have any questions or concerns about this policy or its related procedures please contact:

**Tracy Richardson- Vice President**

416-243-9019 ext. 441

[Trichardson@primacareliving.com](mailto:Trichardson@primacareliving.com)

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