

Policy Title	Accessible Customer Service		
Policy Type	Organizational		
Division	Human Resources		
Department	Human Resources		
Topic	Accessibility		
Approved By	Senior Director, HR	Approval Date	December 2019
Policy Number	OH-OE-018	Next Review Date	December 2021
Supersedes	2015 OH-OE-018, 2013 OH-OE-018		

PURPOSE/SCOPE

This policy addresses requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)* and standards related to accessible customer service.

This policy applies to anyone who provides service on behalf of the LHIN – including all employees, agents, volunteers, and contracted service provider staff.

Although much of this policy addresses the application of the legislation to services provided on LHIN premises, the LHIN recognizes that much of the service we provide is actually delivered in individual client homes. We are committed to honouring the spirit and intent of the policy in all situations.

POLICY

The AODA was created to ensure that goods and services provided in Ontario are accessible to people with disabilities, and that persons with disabilities are treated with respect, dignity and equality. The Central LHIN is committed to providing respectful services that focus on the unique needs of the individual.

Central LHIN will strive to ensure that all employees, volunteers, agents, contractors and others who provide goods or services on behalf of the LHIN are trained in compliance with the Customer Service standard requirements and AODA.

Central LHIN is committed to servicing people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public.

Central LHIN is committed to welcoming and servicing people with disabilities who are accompanied by a support person and will work with the support person to ensure access to service.

Central LHIN will communicate with people with disabilities in ways that take into account their disability.

All agents, contractors, vendors, service providers and anyone else who provides goods or services to clients or the public on behalf of Central LHIN is required to do so in a manner that complies with the terms and intent of this policy.

Definitions

Accessibility: Customer Service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached; or entered; obtainable.

Barrier: 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, a technological barrier, a policy or a practice.

Disability:

1. Any degree of physical 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, brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, deafness or hearing impairment, muteness or speech impediment, or physical reliance on a guide dog, or other animal or on a wheelchair or other remedial appliance or device.
2. A condition of mental impairment or developmental disability.
3. A learning disability, or dysfunctional in one or more of the processes involved in understanding or using symbols or spoken language.
4. A mental disorder.
5. An injury or disability for which benefits were claimed or received under the insurance plan established under *Workplace Safety and Insurance Act, 1997*.

Service Animal: An animal is a service animal for a person with a disability if:

- (a) it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- (b) 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: In relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

PROCEDURE

1. Use of Service Animals

<u>Responsibility</u>	<u>Action</u>
All Employees	<ul style="list-style-type: none"> • Permit a person with a disability on any LHIN location with their service animal unless the animal is excluded by law. Where a service animal is excluded by law, the LHIN will seek to employ other measures that will enable the person with a disability to obtain, use and benefit from the LHIN goods and services. • Make effort to ensure that the service animal admitted to the premises stays with the person with a disability and remains under that person's control.

- Do not touch the service animal without permission.
- Where the presence of the service animal poses a risk to the health and safety of another person (e.g. severe allergies), explore options to minimize the risk while still providing access to service.
- Where there is any question regarding whether or not an animal is fulfilling the role of a service animal, the person with the disability may be asked to supply written confirmation from a physician or nurse.

2. Use of Support Persons

Responsibility

Action

All Employees

- Support access of a person with a disability to their support person while on LHIN premises.
- Clarify with the client the extent to which personal health information may be shared with or communicated in the presence of the support person.

3. Notification of Service Disruption

Responsibility

Action

Vice Presidents

- Ensure processes are in place to provide notice in the event of a planned or unexpected disruption in facilities or services usually used by people with disabilities. Include information about the reason for the disruption, its anticipated duration, and a description of any available, alternate services.

Director,
Communications

- Ensure the notice is made reasonably conspicuous and may be displayed at the location of the disruption, on the website, in a mailing or pamphlet. Depending the circumstances, the Central LHIN, media, government officials and other stakeholders such as service providers may also be notified

Directors, Patient
Services

- Establish processes to contact clients by phone or alternate mode of communication as required prior to an appointment to advise them of the change/disruption and alternatives

4. Accessibility Training

Responsibility

Action

Vice Presidents

- Ensure processes are in place to provide accessibility training persons who deals with members of the public or who participates in developing the organization’s policies, practices and procedures governing the provision of goods and services to the public. This training includes LHIN staff, agents, contractors and others who provide service on behalf of the LHIN. Service Providers, contractors, agents and others who provide service on behalf of the LHIN are required to provide the training to their own staff.

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| Human Resources | <ul style="list-style-type: none"> • Provide employees with accessibility training that includes: <ul style="list-style-type: none"> • the purpose of the AODA • how to interact and communicate with persons with various types of disabilities, who use assistive device(s), or who require the assistance of a service animal or support person • how to use equipment made available by the organization to help people with disabilities access goods and services • what to do if a person with a disability is having difficulty accessing the organization's goods and services • Make employees familiar with policies and assign related training on hire/orientation. • Ensure training is maintained on an ongoing basis in connection with changes to policies, practices and procedures. |
| Quality / Education | <ul style="list-style-type: none"> • Administer training materials • Maintain records of training dates, attendance and content. |
| Managers/Supervisors | <ul style="list-style-type: none"> • Monitor that training is provided to direct reports according to his or her needs and duties and as soon as is practicable after he or she is assigned to the applicable duties. |
| Employees | <ul style="list-style-type: none"> • Participate in mandatory training sessions on accessibility and apply learning to clients, stakeholders, and colleagues. |

5. Feedback Process Responsibility

Action

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| Employees | <ul style="list-style-type: none"> • Encourage the reporting of feedback for persons with disabilities about LHIN goods and services. • Receive feedback, complaint, concern from persons with disabilities trying to access LHIN goods or services. This feedback can be in a variety of formats including in person, by mail, telephone, and fax or otherwise. Document in Quality Reporting System (QRS). |
| Managers/Supervisors | <ul style="list-style-type: none"> • Investigate feedback, complaint or concern. Provide appropriate follow up and document in QRS the resolution status. |
| Director, Patient Experience | <ul style="list-style-type: none"> • Capture comments from Client and Caregiver Experience Surveys and use for improvement. Monitor and address trends. |
| Director, Communications | <ul style="list-style-type: none"> • Promote feedback process on the website and through other printed materials. |

6. Assistive Devices and Communication

<u>Responsibility</u>	<u>Action</u>
All Employees	<ul style="list-style-type: none"> Accommodate for persons with disabilities to use their own assistive devices to help them access our services. Restrictions may exist if there are concerns for the health and safety of others. If so, determine alternate way to accommodate. Provide access to assistive devices and other available communication services. (E.g., offer to communicate using TTY, amplifiers, or relay services). Communicate with people with disabilities in ways that take into account their disability.
Director, Communications	<ul style="list-style-type: none"> Make LHIN policies, procedures on the goods or services for persons with disabilities, service and support animals, process for temporary disruptions, training and feedback available for the public on the website.
Managers/Supervisors	<ul style="list-style-type: none"> Inform staff of the assistive devices available and on premises (magnifiers, large print, etc.) Encourage employees to communicate with customers over the telephone in clear and plain language, speaking clearly and slowly. Promote the utilization of alternate communication services based on the needs of the client. Provide a copy of documents to a person with a disability, considering the person's ability to access the information and/or provide the document or information contained in the document in a format that meets those needs as agreed upon with the person e.g. hard copy, large print, email, Braille

Related Policies:

Visitor Policy, Fire and Evacuation Policy

Related Forms:

Quality Reporting System (QRS), Provincial Contract Template – 2012 – General Conditions for LHIN Services Agreement, Accessible Employment Policy

Related Information:

Central LHIN Accessibility Plan

External References:

Ontario Human Rights Code, Accessibility for Ontarians with Disabilities Act, [Accessibility Ontario Website](#)

Review/Revision History

Reviewed By	Consulted With	Modifications	Revision Number	Date
Director, Organizational Effectiveness	AODA Steering Committee, Service Provider Organizations, Senior Team	NEW policy to comply Customer Service standards under Accessibility for Ontarians with Disabilities Act.		November 2009
Vice-President, OHPI	n/a	Housekeeping changes		August 2011
Vice-President, OHPI	Executive Team, Director Org Effectiveness, Director, Contract Services	NEW Statement of Commitment. Reviewed to ensure compliance with new Integrated Accessibility Standard		November 2013
Director, Org Effectiveness	Vice-President, OHPI	Housekeeping		November 2015
Senior Advisor, HR	AODA Advisory Group	Clarification of responsibilities		December 2019