



**The Corporation of the City of St. Thomas  
Municipal Accessibility**

**Policy: Accessibility Standards for Customer Service**

**Date Approved: October 19, 2009**

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## **1.0 PURPOSE**

The Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") is a Provincial Act with the purpose of developing, implementing and enforcing 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" 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.

This policy is drafted in accordance with the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and addresses the following:

- 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.

This policy applies to all persons who deal with members of the public or other third parties on behalf of the City, whether the person does so as an employee, member of

Council, agent, volunteer, student on placement, or otherwise and all persons who participate in developing the City's policies, practices and procedures governing the provision of goods and services to members of the public or other third parties.

## **2.0 DEFINITIONS**

### **2.0.1 Assistive Device**

A device used to assist persons with disabilities in carrying out activities or in accessing services of persons or organizations covered by the Customer Service Standard.

### **2.0.2 Disability**

- a) 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 service animal or on a wheelchair or other remedial appliance or device,
- b) A condition of mental impairment or a developmental disability,
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) A mental disorder.

### **2.0.3 Service Animal**

- a) A "guide dog", as defined in section 1 of the *Blind Persons Rights' Act*; or
- b) 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,
  - (i) If it is readily apparent that the animal is used by the person for the reasons relating to his or her disability; or

- (ii) If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

#### **2.0.4 Support Person**

- a) A person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to goods or service.

### **3.0 POLICY STATEMENT**

The City of St. Thomas is committed to providing exceptional and accessible service for its customers/residents. Goods and services will be provided in a manner that respects the dignity and independence of all customers. The provision of services to persons with disabilities will be integrated wherever possible. Persons with disabilities will be given an opportunity equal to that given to others: to obtain, use or benefit from the goods and services provided by and on behalf of the City.

## **4.0 CUSTOMER SERVICE POLICIES**

### **4.1.0 Use of Service Animals, Support Persons & Assistive Devices**

#### **4.1.1 Service Animals**

If a guide dog or other service animal accompanies a person with a disability, the City will ensure that:

- a) Service animals are permitted in all City owned and operated facilities accessible to the public with the exception of food preparation areas or unless the animal is otherwise excluded by law
- b) The care and control of service animals is the responsibility of the owner

If a service animal is excluded by law from the premises, the appropriate department shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the provider's goods or services.

If it is not readily apparent that the animal is a service animal, the City may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability. The City may instead ask for 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.

#### **4.1.2 Support Persons**

If a support person accompanies a person with a disability, the City will ensure that:

- a) Support persons are permitted access to all public areas in facilities owned and operated by the City

- b) Support persons accompanying a person with a disability will not be charged any fees for accessing City programs, services and events
- c) Support persons are expected to attend to the needs of the person with a disability at all times during the use of the City facility

#### **4.1.3 Assistive Devices**

The City will allow persons with disabilities to use their own personal assistive devices to obtain, use or benefit from the services offered by the City.

Should a person with a disability be unable to access the City's services through the use of their own personal assistive device, the City will ensure the following measures:

- a) Determine if service is inaccessible, based upon individual requirements
- b) Assess service delivery and potential service options to meet the needs of the individual
- c) Notify the person with a disability of alternative service and how they can access the service, temporarily or on a permanent basis

#### **4.2.0 Notice of Temporary Disruptions**

The City is aware that the operation of its services and facilities is important to the public. However, temporary disruptions in the City's services and facilities may occur due to reasons that may or may not be within the City's control or knowledge.

#### **4.2.1 Means of Notice**

The Department Head directly associated with the affected "disruption" will ensure that the notice is provided to the public and any staff that needs to be informed.

Advance notice based on the specific circumstances will be provided where possible directed to the public in a variety of forms. These forms will include but are not limited to:

- a) Posted signage in area affected
- b) City Website under Municipal Accessibility
- c) Direct Mail/Newspaper Advertisement

#### **4.2.2 Notice**

Any Notice of Disruption will contain the following:

- a) Reason for disruption in service
- b) Anticipated duration
- c) Alternate services available including contact information

If the City website itself should experience a temporary service disruption, advance notice where possible, keeping with the conditions of the service disruption section of this policy, shall be provided on the website.

### **4.3.0      Feedback Process**

#### **4.3.1      Methods of Feedback**

The City is committed to providing high quality goods and services to all members of the public that it serves. Feedback from the public is welcome as it may identify areas that require change and encourage continuous service improvements.

The City accepts feedback from the public through the following methods:

- a) City website
- b) In person
- c) Telephone
- d) Written complaint/letter
- e) Email

#### **4.3.2      Feedback Form**

The request for feedback form can be found:

- a) On the City website
- b) In each individual department

#### **4.3.3      Submitting Complaint**

Should a member of the public wish to make a complaint regarding a service they have received the following actions will take place:

- a) The member of the public with the complaint or concern should have a discussion with the employee at the City who is involved in the situation
- b) Should the discussion not resolve the complaint the member of the public should fill out a complaint form. An employee can assist the member of the public with

- the complaint form in a manner that takes into consideration their disability
- c) The information to be provided by the member of the public on the complaint form should include their personal contact information, the date, a description of the complaint, and what the member of the public requests to resolve the complaint
  - d) The complaint should be forwarded to the Department Head responsible for the department involved
  - e) The Department Head will attempt to resolve the complaint in a timely manner
  - f) The member of the public will be contacted once a resolution has been reached

#### **4.3.4 Submitting Suggestion**

Should a member of the public wish to provide the City with a suggestion on how to improve the municipal accessible standards/services provided:

- a) Member of the public will inform employee of suggestion
- b) Employee will assist member of the public in filling out the suggestion form, should they require assistance
- c) Member of the public will be notified in a timely manner of how the City will proceed with their suggestion
- d) Employee response should include: an explanation of how to implement the suggestion, a response indicating further investigation or an explanation why the suggestion is not able to be implemented

All complaints and suggestions should be recorded on a complaint/suggestion form, and forwarded to the responsible Department Head.

#### **4.4.0 Notice of Availability of Documents**

All documents required by the Accessibility Standards for Customer Service, including the City's Accessible Customer Service policies, procedures and practices, notices of temporary disruptions, training records, and written feedback process are available upon request.

When providing a document to a person with a disability, the City will provide the document, or the information contained in the document, in a format that takes the person's disability into account.

#### **4.4.1 Means of Notice**

The City may provide the public notice of the availability of documents by the following:

- a) posting it on the City website
- b) posting it in all City owned and rented facilities
- c) posting it in a newspaper advertisement

#### **4.4.2 Notice to Include**

The notice of availability of documents will include the following:

- a) what information will be made available
- b) in what format the documents can be provided in
- c) how often the documents will be available
- d) where the documents will be made available

#### **4.4.3 Where Documents are Available**

The documents will be provided in the following areas:

- a) on the City website

b) through each department

#### **4.5.0 Format of Documents**

Should the City be required to give a copy of a document to a person with a disability, the City shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability.

Material printed in-house and publications produced on behalf of the Corporation of the City of St. Thomas should contain a note indicating, "Alternate Formats are Available Upon Request" and include relevant contact information.

The City and the person with a disability will try to agree upon the format to be used for the document or information, subject to feasibility requirements of this policy.

Feasibility will be determined based upon cost in relation to size of document and time associated with processing document requests.

The time frame attached to the conversion process varies depending on the media chosen, the size, complexity, quality of source documents and number of documents to be converted. Documents shall be returned in a timely manner depending on the factors previously noted.

Conversion shall be processed in-house wherever possible. When a member of the public requests a piece of City documentation in a multiple format, the department of origin shall be responsible for the cost of the conversion, materials and distribution, not the public requestor.

In-house printing, where possible, should have regard for the CNIB's Clear Print Standards.

Alternative formats that should be considered by the City and the person with the disability will include, but are not limited to:

(i) Print Requests:

Requests for alternative formats should be honoured in the most practical manner depending on the media chosen, the size and complexity of the document, the quality and source of the documents, the feasibility of the request (including the cost) and the number of documents converted. It should be noted that when a request for one of these formats is received and deemed feasible, staff should make every attempt to respond to the request in the most practicable manner and to the satisfaction of the requestor. If it is determined that the format requested is not feasible, then other alternative methods of providing the information should be explored that will still meet the needs of the requestor (e.g. Audio CD or explaining the information verbally etc.).

- a) Employee receives request from member of the public for alternative format
- b) Employee fills out alternative format request form
- c) Employee forwards request to the responsible Department Head
- d) Department Head determines feasibility
- e) Department Head proceeds with alternative format request
- f) If not feasible; contact individual with feasible solution

(ii) ASL Interpreter Request:

- a) Employee receives request from member of the public for ASL Interpreter
- b) Employee fills out alternative format request form
- c) Employee forwards request to the responsible Department Head
- d) Department Head contacts Canadian Hearing Society to make request
- e) Once Canadian Hearing Society confirms attendance of ASL Interpreter, the Department Head contacts individual
- f) If ASL Interpreter is not available, Department Head will contact individual with alternative solution

#### **4.6.0 Accessibility Training Policy**

##### **4.6.1 Persons to Receive Training**

The City shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities:

- a) Every person who deals with members of the public or other third parties on behalf of the City, whether the person does so as an employee, agent, volunteer or otherwise
- b) Every person who participates in developing the City's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties

##### **4.6.2 Training Provided**

The training will include a review of the purposes of the Act and the requirements of this policy and instruction about the following matters:

- a) How to interact and communicate with persons with various types of disability, as outlined in this policy and procedures
- b) How to interact with persons 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, as outlined in this policy and procedures
- c) How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability
- d) What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services

The amount and format of training given will be tailored to suit each person's interactions with the public. Different levels may include:

- a) In house training session
- b) Interactive DVD training

The training will be provided as soon as practicable to all employees. Training will also be provided on an ongoing basis to new employees through orientation (ie. video session) and in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.

#### **4.6.3 Records of Training**

Records will be kept of the training provided, including the dates on which the training is provided, location and the number of individuals to whom it is provided. Files will be kept in the Human Resources Department.

**4.7.0 Relating and Supporting Documentation**

**4.7.1 Feedback Form**

**Corporation of the City of St. Thomas  
Municipal Accessibility: Customer Service Standards  
Feedback Form**

**Name:** \_\_\_\_\_

**Telephone Number:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**E-mail Address:** \_\_\_\_\_

**Department Involved in Feedback:** \_\_\_\_\_

**Feedback:**

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Feedback will be collected and sent to the appropriate department.

A representative of the department will contact you.

Thank you for taking the time to fill out this form.

City of St. Thomas (519) 631-1680 extension 4125



**4.7.3 Example of Notice of Disruption**

**Elevator Down for Temporary Maintenance**

**March 20, 2009**

**From approximately 8:30 a.m. - 4:30 a.m.**

**Please use stairs if possible**

**Any questions please call Building Maintenance  
Division at (519) 631-1680 ext. 4180**

**On behalf of the City of St. Thomas we would like to  
thank you for your patience in this matter.**

