



Policy: **INTEGRATED ACCESSIBILITY STANDARDS
REGULATION – CUSTOMER SERVICE**

Issue Date: July 2021

Next Review Date: July 2022

Approved by: Vice President, Finance & Administration

POLICY STATEMENT AND ORGANIZATIONAL COMMITMENT

Huron University College (“Huron”) is committed to working towards being compliant with all the standards in the *Accessibility for Ontarians with Disabilities Act* (“AODA”) and *Integrated Accessibility Standards Regulation*, O. Reg. 191/11 (“IASR”). Huron recognizes the importance of developing, implementing and enforcing standards in a timely manner in order to achieve accessibility for Ontarians with a disability. Huron is committed to the principles of independence, dignity, integration and equality of opportunity described in the AODA and IASR and to meeting the needs of people with disabilities through the implementation of this policy. Huron is committed to excellence in serving our community, including persons with disabilities. When providing information to, or communicating with a person with a disability, Huron will provide information and communication in a manner that takes into account the person’s disability.

PURPOSE

The purpose of this policy is to serve as a statement of institutional commitment that Huron will use reasonable efforts to ensure that:

1. all goods, services or facilities provided by Huron will be provided in a manner that respects the dignity and independence of persons with disabilities;
2. the provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities of Huron;
3. persons with disabilities are given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities of Huron;
4. when communicating with a person with a disability, Huron shall do so in a manner that takes into account the person’s disability.

SCOPE AND RESPONSIBILITIES

This policy has been drafted in accordance with the AODA and IASR and addresses how Huron will meet the Customer Service Standards as set out under the IASR. It applies to the provision of all goods, services and facilities to the public or other third parties, not to the goods themselves.

This policy applies to all members of the Huron Community, which includes, without limitation, employees, staff, faculty, students, volunteers, applicants for employment, contractors, and other individuals who live, work, or visit the Huron campus.

Please note that nomenclature used in the legislation includes terminology such as “customer” and “goods”. Consistent with the culture of an educational institution, Huron interprets “customer” to mean an all-encompassing term referring to any member of the Huron Community.

DEFINITIONS

Assistive device: A technical aid, communication device, or other instrument used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

Disability: As defined by the AODA and associated regulations as well as the *Ontario Human Rights Code* (“OHRC”), disability 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: A trained 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: A service animal for a person with a disability provided:

- The animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
 - i. College of Audiologists and Speech-Language Pathologists of Ontario;
 - ii. College of Chiropractors of Ontario;
 - iii. College of Nurses of Ontario;
 - iv. College of Occupational Therapists of Ontario;
 - v. College of Optometrists of Ontario;
 - vi. College of Physicians and Surgeons of Ontario;
 - vii. College of Physiotherapists of Ontario;
 - viii. College of Psychologists of Ontario; or
 - ix. College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support person: In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods, services or facilities.

GUIDELINES

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

Huron will make every reasonable effort to ensure that our 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 way, at their own pace when accessing goods, services or facilities, as long as this does not present a health and safety risk;
- Using alternative methods when necessary to ensure that customers with disabilities are given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities of Huron;
- Taking into account individual accommodation needs when providing goods, services or facilities; and
- Communicating in a manner that takes into account the customer's disability.

2. The Use of Assistive Devices

a. Customer's Own Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods, services or facilities provided at Huron. In cases where the assistive device presents a health and safety concern, or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship. Where elevators are not present and where a customer requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

b. Guide Dogs and Service Animals

A customer with a disability who is accompanied by a guide dog or service animal 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 or service animals. Staff or Faculty may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

Food Service Areas

A customer with a disability who is accompanied by guide dog or service animal will be allowed access to food service areas that are open to the public unless otherwise excluded by law. Pursuant to Ontario Regulation 493/17: *Food Premises* under the *Health Protection and Promotion Act*, service animals are permitted into areas where food is served, sold, or offered for sale.

If a customer's guide dog or service animal is excluded by law, Huron will offer alternative methods to enable the person with a disability to access goods, services or facilities, when possible. For

example, Huron may accommodate a customer's disability by securing the animal in a safe location and offering the assistance of an employee to facilitate the delivery of goods and services.

Recognizing a Guide Dog or Service Animal

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, Huron may request verification from the customer.

Care and Control of the Animal

The customer who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Huron will make all reasonable efforts to meet the needs of all individuals. Pursuant to our obligations under the *Ontario Human Rights Code* and the *Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, Huron must fully analyze all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff or faculty may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

c. The Use of Support Persons

If a customer with a disability is accompanied by a support person, Huron will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person. There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, Huron will make every reasonable attempt to resolve the issue. In situations where confidential information might be discussed, consent will be obtained from the customer before any potentially confidential information is mentioned.

Admission Fees

Where a support person is required to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, Huron will not charge the support person any fees or fares.

3. Notice of Temporary Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Huron. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use 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.

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Facilities or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services of facilities, if any, that are available.

When disruptions occur, Huron 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, or on Huron's website.
- Where reasonable, contacting customers with appointments;
- Verbally notifying customers when they make an appointment; or
- By any other method that may be reasonable under the circumstances.

4. Training

Training will be provided to:

- Every employee or volunteer with Huron;
- Every person who participates in developing the policies of Huron; and
- Every other person who provides goods, services, or facilities on behalf of Huron.

a. Training Provisions

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 customer service standards;
- 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 or other service animal; and

- Require the use of a support person (including the handling of admission fees);
- How to use equipment or devices available on the Huron premises or otherwise provided by Huron that may help with the provision of goods, services or facilities to a person with a disability;
- Instructions on what to do if a person with a disability is having difficulty accessing Huron's goods, services or facilities; and
- Policies, procedures, and practices of Huron pertaining to providing accessible customer service to customers with disabilities.

b. Training Schedule

Huron will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents, and contractors during orientation. Updated training will be provided in the event of changes to legislation, procedures, policies, or practices.

c. Record of Training

Huron will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

5. Customer Feedback

Huron shall provide customers with the opportunity to provide feedback on the services or facilities provided to customers with disabilities, as well as information about the feedback process. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

Customer feedback can be submitted to:

Deborah Lucas, Vice President, Finance & Administration
 1349 Western Road, London, ON N6G 1H3
 519-438-7224 ext: 245
dlucas4@huron.uwo.ca

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

6. Format of Documents

Huron shall notify customers that the documents related to the customer service standards are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Huron, the website of Huron, and any other reasonable method.

EVALUATION

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to Huron's policy and/or procedures.