

Name of Manual	Quality Client Experience	Policy QCE 105	Page 1 of 5
Policy Title:	PROVIDING CUSTOMER SERVICE TO PEOPLE WITH DISABILITIES	Original Date:	July 2011
Prepared by:	Risk Management Team Lead	Previous Approval:	October 2011
Reviewed by:	Quality Improvement Committee	Reviewed:	September 2020
Approved by:	Executive Director & Team Leads	Approved:	September 2020

In fulfilling our mission, the North Lambton Community Health Centre strives at all times to provide its services in a way that respects the dignity and independence of people with disabilities. The North Lambton CHC is committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services, in the same place and in a similar way, as other clients.

1.0 Policy: Providing Customer Service to People with Disabilities

North Lambton CHC is committed to excellence in serving all clients, including people with disabilities, and we will carry out our functions and responsibilities in the following areas:

1.1 Communication

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

We will train staff how to interact and communicate with people with various types of disabilities.

1.2 Telephone Services

We are committed to providing fully accessible telephone service to our clients. We will train staff to communicate with clients over the telephone in clear and plain language and to speak clearly and slowly.

Bell Relay Service can be used by calling 1-800-855-0511.

We will offer to communicate with clients by email or text if telephone communication is not suitable to their communication needs or is not available.

1.3 Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use, or benefit from our services. The North Lambton CHC will ensure its staff is trained and familiar with various assistive devices that may be used by clients with disabilities while accessing our services.

The North Lambton CHC will also ensure staff knows how to use the following assistive devices available on our premises for clients: wheelchairs, call bells, automatic door openers, elevator, voice amplifier, flashcards, Bell Relay Service.

2.0 Use of Service Animals

The Blind Persons' Rights Act and the Health Protection & Promotion Act speak only to **dogs** being considered a guide or service animal. The AODA includes guide dogs and any other animal that provides a service.

From the AODA:

"guide dog" means a guide dog as defined in section 1 of the Blind Persons' Rights Act "service animal" means an animal described in subsection (9);

- (9) For the purposes of this section, an animal is a service animal for a person with a disability,
 - (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - (b) if the person provides a letter from a physician or nurse practitioner confirming that the person requires the animal for reasons relating to the disability.

From Blind Persons' Rights Act:

"guide dog" means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.

Identification cards - The Attorney General or an officer of his or her Ministry designated by the Attorney General in writing may, upon application therefor, issue to a blind person an identification card identifying the blind person and his or her guide dog.

Cards as proof of qualification - An identification card issued under subsection (1) is proof, in the absence of evidence to the contrary, that the blind person and the guide dog identified therein are qualified for the purposes of this Act.

From Health Protection & Promotion Act, Ontario Regulation 562

- 59. (e) every room where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale is kept free from, (ii) subject to section 60, live birds and animals;
- 60. (1) Subclause 59 (e) (ii) does not apply to,
 - (a) a service dog serving as a guide for a blind person or for a person with another medical disability who requires the use of a service dog, if the service dog is in an area of the food premise where food is served, sold or offered for sale;
 - (2) A dog other than a guide dog for the blind is a service dog for the purposes of clause (1) (a) if,
 - (a) it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
 - (b) the person who requires the dog can provide on request a letter from a physician or nurse practitioner confirming that the person requires a service dog. O. Reg. 74/04, s. 4 (2).

A service animal is specially trained to assist an individual with disabilities. If you can identify that the service animal is used by a person with a disability for reasons relating to a disability, in Ontario, the person cannot be asked to prove the animal is working. If it is not readily apparent the animal is a service animal, then the Ontario regulation states that a letter may be requested from a physician or nurse practitioner confirming that the person requires the animal for reasons relating to a disability. Under no circumstances is the service provider allowed to ask about the nature of the disability.

Note that doctors and nurse practitioners do not use standardized letterhead and you might have difficulty confirming a letter is real. Please note that people with disabilities may not be aware of the need for the letter. You may want to allow the person to enter your premises with a polite request to bring a letter next time.

The animal must be trained and under control of the person with a disability. Service animals are expected to be well-groomed and free of parasites such as fleas and ticks. Service animals are expected to be in good health. The service animal's partner/owner is expected to assume responsibility for any damages (bodily or property) caused by the animal. Trained and controlled service animals are well-behaved, follow commands of the partner/owner, and should know where it is appropriate to eliminate their body waste.

A service animal may be excluded only when the following conditions exist:

- The service animal is disruptive, and the partner/owner is not effectively controlling it
- The presence of the service animal would fundamentally change the nature of the job, program, service, or activity. This would include the need for a sterile environment when doing procedures requiring heightened infection control measures, or when food is being prepared.
- The service animal's presence, behaviour, or actions pose an unreasonable or direct threat to the property or health and safety of others. A direct threat is not remote or speculative, such as thinking the animal might bite someone or will annoy others. Allergies or fear of animals are generally not valid reasons to exclude a service animal.

When necessary, accommodations will be arranged to meet both the needs of the client accompanied by a service animal and the staff right to a safe workplace.

3.0 Support Persons

North Lambton CHC is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the Centre's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

Most services and programs offered by North Lambton CHC are free of charge for clients and participants, including a support person accompanying a person with a disability. When a service or program has a cost-recovery fee, the support person will not be required to pay the fee.

4.0 Notice of Temporary Disruption

North Lambton CHC provide advance notice of planned disruptions in its facilities or services. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Regarding unplanned disruptions, the North Lambton CHC endeavors to provide notice as soon as possible after learning of the disruption, (e.g. snow days).

Regular hours of operation and known holiday day are listed on the North Lambton CHC's website. Written notices of disruptions will be posted at all public entrances and service counters of the North Lambton CHC sites. For both planned and unexpected disruptions, during the time of the disruptions, the answering message on the telephone will be changed to relay this information. Information for unexpected disruptions will be provided

through services offered by the local radio station and on North Lambton CHC's social media avenues.

5.0 Training for Staff and Volunteers

North Lambton CHC will provide Accessible Customer Service training to all staff, volunteers, and others who deal with the public on their behalf, and all those who are involved in the development and approvals of customer service policies, practices, and procedures.

The training will be provided during orientation, within three months, after staff commence their duties.

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities, ensuring understanding that the client is a person, not a disability
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to operate/use the wheelchairs, automatic door openers, crutches, voice amplifier, call bells, etc. available at sites
- What to do if a person with a disability is having difficulty in accessing North Lambton CHC's services.
- North Lambton CHC's policies, practices, and procedures relating to the customer service standard.

Staff will also be trained on an ongoing basis when changes are made to these policies, practices, and procedures.

6.0 Feedback Process

The ultimate goal of North Lambton CHC is to meet and surpass customer service expectations. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback can be provided in by the method most suitable for the customer:

- Client Feedback papers available in all site waiting rooms
- On line using the Inquiries and Feedback icon of the North Lambton CHC's website
- In person, by calling to arrange a good date and time for a face-to-face conversation

North Lambton CHC maintains policies and procedures specifically addressing feedback; see QCE Policy 101 Feedback and QCE Form 001 Formal Feedback Form.

7.0 Modifications to This or Other Policies

We are committed to developing customer service policies that respect and promote the dignity and independence of all people, including people with disabilities. Any policy of North Lambton CHC that does not respect and promote the dignity and independence of people with or without disabilities will be modified or removed.

8.0 Questions About This Policy

This policy exists to achieve service excellence to clients with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, the Executive Director of North Lambton Community Health Centre.

References:

https://www.aoda.ca/customer-care-standard/

https://www.aoda.ca/service-animals-and-people-with-disabilities-%E2%80%93-aoda-best-practices/

<u>Compliance Manual: Accessibility Standards for Customer Service, Ontario Regulation 429/07, Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Ministry of Community and Social Services, October 2008</u>

<u>Service Animals and People with Disabilities – AODA Best Practices</u>, June 23, 2011 Advocate, Suzanne, Cohen Share

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