



SUBJECT:	Customer Service Policy on Providing Goods and Service to People with Disabilities	Page 1 of 9
ORIGINAL ISSUE:	December 2009	APPROV. AUTH: Chief Executive Officer
PAST REVISIONS:	May 2022	RESPONSIBILITY: Human Resources
CURRENT DATE:	March 2024	DIVISION: Hellenic Home for the Aged

PREAMBLE:

- a) This policy applies to the provision of goods and services at premises owned and operated by Hellenic Home for the Aged.
- 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 Hellenic Home.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs only apply to the provision of goods and services that take place at premises owned and operated by Hellenic Home.
- d) This policy shall also apply to all persons who participate in the development of the Hellenic Home’s policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

POLICY:

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities.
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

- A. The Provision of Goods and Services to Persons with Disabilities

Hellenic Home 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 customers receive the same value and quality;
- Allowing customers 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 customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Hellenic Home.

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 customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer 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 customer.

Assistive devices provided by Hellenic Home:

The following assistive devices are available on a first come, first serve basis and upon request, to assist customers in accessing our goods and services:

- Grab Bars
- Hand Railings
- Walkers
- Walking Canes
- Wheelchairs

C. Guide Dogs, Service Animals and Service Dogs

A customer 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 customer 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), Hellenic Home 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).

Applicable Laws:

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

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 pitbulls) 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 customer for reasons relating to his or her disability, Hellenic Home may request verification from the customer.

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 customer 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, Hellenic Home will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a customer with a disability is accompanied by a support person, Hellenic Home will ensure that both persons are allowed to 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, Hellenic Home will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

If a customer needs a support person provided by Hellenic Home to assist, this will be provided at no cost.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Hellenic Home. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Hellenic Home' 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, Hellenic Home will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance (Front Desk) and the nearest accessible entrance to the service disruption and/or on the Hellenic Home website (www.hellenichome.org)
- contacting customers with appointments.
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

F. Feedback Process

- Hellenic Home shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the Hellenic Home external website (www.hellenichome.org), on the premises at Front Desk.

Submitting Feedback:

1. Front Desk can receive feedback in the following manner:
 - Feedback which can be submitted in writing (anonymous or not) to the Front Desk
 - Verbally (in person or by telephone)
 - Written (handwritten by customer, written by Front Desk on behalf of customer, delivered)
2. The Hellenic Home website can be used to submit feedback via:
 - Email
 - On the Website (message can be sent and then viewed internally by appropriate parties)

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Hellenic Home employee

3. Customers can submit feedback by email, regular mail, courier, telephone or any other mean to either:

Attn: Executive Assistant
 33 Winona Drive
 Toronto, Ontario
 M6G 3Z7
 (416) 654-7700 ext.2222
hhome@hellenichome.org

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

All other requests to provide feedback in any other format not stated above can be made to the Executive Assistant or the Human Resources Department at Hellenic Home who will accommodate such requests.

Hellenic Home will endeavor to respond within ten (10) business days.

G. Training

Training will be provided to:

- a) all employees, volunteers, students, agents and/or contractors who deal with the public or other third parties that act on behalf of Hellenic Home.
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in *Ontario Regulation 191/11*, 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 *Integrated Accessibility Standards Regulation, O Reg. 191/11*.
- 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.
- (Hellenic Home)'s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training may be completed through a variety of means including but not limited to:

- Online training.
- Small class training.
- Management team presentations.

- New hire orientation; and/or,
- Independently reviewing a hardcopy of the training materials

Training Schedule:

Hellenic Home will provide training as soon as practicable. Training will be provided to new employees, volunteers, students, agents and/or contractors who deal with the public or act on our behalf during orientation.

Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

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

Training records will be kept by the Human Resources Department.

H. Notice of Availability and Format of Documents

Hellenic Home shall notify customers that the documents related to the *Accessibility Standard for Customer Service* 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 Hellenic Home, the Hellenic Home' website and/or any other reasonable method.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Attn: Executive Assistant
33 Winona Drive
Toronto, Ontario
M6G 3Z7
(416) 654-7700 ext.2222
hhome@hellenichome.org

This policy and its related procedures will be reviewed as required in the event of legislative changes.

PROCEDURE:

1. The Policy will be updated as appropriate or when legislative changes are made. The Senior Management Committee and the Health and Safety Committee will also review this policy annually.

2. Any Hellenic Home policy, practice or procedure that does not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed.
3. Training will be overseen by the Administrator/designate. Records will be kept in the Finance Department office.

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 customers 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 – Integrated Accessibility Standards Regulations Ontario 191/11, 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 191/11*, 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 191/11*, 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.

REFERENCES:

- Accessibility for Ontarians with Disabilities Act, 2005
- Integrated Accessibility Standards, *Ontario Regulation 191/11*
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990

CROSS REFERENCE

Hellenic Home Accessibility Plan