

**SUBJECT** | Accessible Customer Service  
**CATEGORY** | Agency – General  
**DIVISION** | Administrative Services

**NUMBER** | CA.50.01.105  
**EFFECTIVE** | March 28, 2024  
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## POLICY

Wellington-Dufferin-Guelph Public Health (WDGPH) is committed to providing programs and services in a way that respects the dignity and independence of people with disabilities. Wherever possible, persons with disabilities will benefit from the same services, in the same place and in the same or similar way as other clients. Programs and services provided to persons with disabilities and other clients shall be integrated, unless alternative measures are required (whether on a temporary or permanent basis) to enable a person with a disability an opportunity equal to that given to others to obtain, use or benefit from WDGPH programs and services.

### PURPOSE:

WDGPH is committed to treating all people in a way that allows them to maintain their dignity and independence. The Agency is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* (AODA), the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code (OHRC).

In addition, this policy and procedure will serve to inform members of the public regarding their rights and WDGPH obligations with respect to:

- the provision of goods, services and facilities to persons with disabilities
- the use of support persons, assistive devices and service animals by persons with disabilities
- notice of temporary disruptions in services and facilities
- client feedback and accessible communications

### PROVISION OF SERVICES:

#### Accessibility Plan:

WDGPH has developed and implemented a multi-year accessibility plan outlining its strategies to remove and prevent barriers that impede persons with disabilities from fully participating or benefitting from WDGPH programs and services. The multi-year plan is maintained, reviewed, and updated every three years, as required. The plan has been posted to the WDGPH website and will be made available in accessible formats upon request.

#### Accessibility Policies and Procedures:

WDGPH will develop, review and/or update its policies and procedures and practices, including those for purchasing and procurement, to ensure compliance with the AODA, IASR, and OHRC.

#### Training:

WDGPH is committed to training staff, students, volunteers and contractors on Ontario's accessibility laws and on accessibility aspects of the OHRC that apply to persons with disabilities. An online training module focused on the

Customer Service Standard is freely available to all employees on the internal Agency website for reference at any time.

This training covers the following topics:

- purpose of the AODA
- overview of the requirements of the Customer Service Standard
- how to interact with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person
- what to do if a person with a disability is having difficulty accessing your organization's goods, services or facilities

Documented completion of this training module as well as review of this policy and procedure is required within the first six weeks of a new employee, student, volunteer or contractor's tenure with the organization.

## **THE USE OF SUPPORT PERSONS, ASSISTIVE DEVICES AND SERVICE ANIMALS:**

### **Use of Support Persons:**

If the person with a disability is accompanied by a support person, WDGPH will ensure that both persons are permitted to enter the premises together and the support person is permitted to stay with the person with a disability while accessing goods, services or our facilities. In certain circumstances, WDGPH may require that a person with a disability be accompanied by a support person to protect their health and safety, or that of others.

Where confidential matters are discussed, the support person may be subject to the same confidentiality and privacy requirements as the person with a disability whom they are assisting.

Fees will not be charged for a support person when a person with a disability is accessing services subject to an admission or program fee.

### **Use of Assistive Devices:**

WDGPH will ensure that persons with a disability who use assistive devices have equal access to our goods, services and facilities. Where a barrier exists that prevents the use of a personal assistive device in accessing goods, services and facilities, or where it is determined that the assistive device may pose a risk to the health and safety of the individual or others on the premises, WDGPH will assess the service delivery and provide alternative methods to meet the needs of that person.

### **Use of Service Animals:**

A person with a disability who is accompanied by a guide dog or service animal will be given access to all WDGPH premises and allowed to keep their animal with him or her when obtaining goods or services or accessing our facilities, unless prohibited by law. If the animal is prohibited access to our facilities by law, WDGPH will make reasonable accommodations to provide services or goods to the person with a disability as soon as practicable.

## **NOTICE OF TEMPORARY DISRUPTIONS:**

Where there are temporary disruptions, either planned or unplanned, causing interruptions in the delivery of services, goods or access to facilities for people with disabilities, WDGPH will provide notice of the disruption to

the public as soon as possible. Notices will include the reason for the disruption, its anticipated duration and information about alternative services or facilities, if any.

Information about temporary disruptions will be posted at the Agency's premises and on the Agency's website. If appropriate, notice will be sent to the media for dissemination.

## **CLIENT FEEDBACK, ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS:**

### **Feedback Process:**

WDGPH welcomes feedback about the way services and goods are provided to persons with disabilities. Feedback may be compliments, complaints or suggestions for improvement on how services and goods may be better delivered to people with disabilities or on how our facilities may be made more accessible. Feedback may be submitted in person, in writing, by telephone, in electronic format or by using the CA.30.01.003 *Accessible Customer Service Feedback Form* on the WDGPH website or by email to [access@wdgpublichealth.ca](mailto:access@wdgpublichealth.ca).

All feedback will be reviewed and the person providing the feedback will receive a response if they provide contact information. Responses will outline the actions that WDGPH will take to improve the delivery of goods, services and facilities to persons with disabilities.

### **Accessible Formats and Communication Supports:**

WDGPH is committed to meeting the communication needs of people with disabilities. When asked, information and communication materials will be provided in accessible formats or with communication support. This includes publicly available information about Agency goods, services and facilities, as well as publicly available emergency and safety information.

WDGPH will consult with people with disabilities to determine their individual information and communication needs when accessible formats are requested.

## **SCOPE**

This policy applies to all Agency goods, services and facilities. It encompasses interactions with persons with disabilities in both physical and virtual environments, including but not limited to:

- access to physical locations, including offices, clinics and event venues
- access to digital platforms, such as websites and online services
- access to assistive devices and services, such as interpreters, assistive listening devices and accessible formats of documents
- communication channels, including phone calls, emails and (by request) documents with accessible formats
- participation in events, workshops and conferences hosted by the Agency

This policy shall be carried out by all Agency employees, students, volunteers, contractors and third-party vendors acting on behalf of the Agency who deal with the public on behalf of WDGPH, ensuring consistent adherence across all aspects of Agency operations.

## **PROCEDURE**

WDGPH will follow its Accessibility Plan and accessibility policies and procedures in the delivery of its goods, services and facilities to public clients. All WDGPH employees have an obligation to comply with the Customer

Service Standard, as outlined in the AODA, IASR, and OHRC, according to their level of training and the best of their ability.

## RESPONSIBILITY

### Management will:

- ensure all new employees, students, volunteers and contractors comply with the training requirements outlined in this policy within the first six weeks of employment
- ensure the Customer Service Standard is being followed in the delivery of goods, services and facilities relevant to their department
- seek guidance from external sources, if required, if they are unsure how to meet the accessibility requirements of a particular client

### Employees will:

- complete training focused on the Customer Service Standard within the first six weeks of employment
- seek guidance from a manager if they are unsure how to meet the accessibility requirements of a particular client

## DEFINITIONS

- **Accessibility** – refers to the design of products, devices, services or environments that enable persons with disabilities to fully and equally access goods, services, facilities, accommodation, employment, buildings, structures and premises. Ontario has laws to improve accessibility for people with disabilities, including the AODA, IASR, OHRC, and the Ontario Building Code.
- **Accessible Formats** – communication materials that may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- **Assistive Devices** – technical aids, communication devices or other instruments used to maintain or improve the functional abilities of people with disabilities (such as a wheelchair, specialized learning software, oxygen tank or hearing aid). Personal assistive devices may assist in breathing, hearing, seeing, communicating, moving, remembering and/or reading.
- **Barrier** – anything that keeps a person with a disability from participating fully in society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.
- **Disability** – as defined under the OHRC and AODA, disability shall mean:
  - any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defects 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 coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, 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
  - an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997* (“handicap”)
- **Guide Dog** – a service dog trained as a guide for a blind person and having the qualifications prescribed by the regulations of the *Blind Persons’ Rights Act, 1990*.
- **Persons with Disabilities** – individuals who have a disability defined under the OHRC and AODA.

- **Service Animals** – animals, typically dogs, trained to help persons with disabilities maintain independence. Service animals have training to perform specific tasks for the benefit of a person with a disability. An animal is a service animal if:
  - it is readily apparent that the person requires the animal for reasons relating to a disability
  - if the person provides an identification card or a letter from a healthcare practitioner confirming that the person requires the animal for reasons related to a disability
- **Support Person** – a person who accompanies a person with a disability to maintain their dignity and independence, by assisting with communication, mobility, personal care, medical needs or access to goods, services, and facilities.

## REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES

- CA.50.01.127 *Integrated Accessibility Standards Regulations*
- CA.30.01.002 *Accessible Customer Service Request for Information and Communication*
- CA.30.01.003 *Accessible Customer Service Feedback Form*
- *Ontario Regulation 191/11, Integrated Accessibility Standards*
- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Human Rights Code, R.S.O. 1990*
- *Blind Persons' Rights Act, R.S.O. 1990*

**CONTACT FOR INQUIRIES** – CHRO/Corporate Director Human Resources

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**APPROVED BY:** Vice President, Human Resources and Corporate Services/CAO



**REVISION DATES:** Dec 1, 2015, Mar 28, 2024