



Town of Whitby Procedure

Procedure Title: Accessible Customer Service
Procedure Number: A 030-001
Reference: A 030 Accessible Customer Service Policy
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Approval: Chief Administrative Officer
Point of Contact: **Accessibility Coordinator**

Purpose

The Corporation of the Town of Whitby shall promote accessibility throughout the development of programs, services, policies and facilities, by ensuring consideration is given to persons with disabilities. To do this, we must ensure that each recognizes and treats all employees, residents and volunteers with dignity, independence, integration and equal opportunity.

Scope

This procedure applies to all Town of Whitby employees, elected officials, volunteers and anyone performing work on behalf of the Town of Whitby.

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1 Definitions

- 1.1 Accessible Formats** means formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats may include large print, Braille, and audio electronic formats such as DVDs, CDs, etc.
- 1.2 Accommodation** means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the customer's unique needs.
- 1.3 Assistive Device** means a technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities.
- 1.4 Barrier** means anything that prevents a person with a disability from fully participating in all aspects of 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.
- 1.5 Communication** supports means anything that supports individuals with disabilities access information, facilitating communication between 2 or more people. Some examples include plain language formats, sign language, as well as reading out loud, captioning, or using written notes to communicate.
- 1.6 Customer** means persons to whom the Town provides goods and services and those who access Town facilities for the purpose of conducting business with the Town. This definition excludes those who perform duties for the Town, or on behalf of the Town such as staff, volunteers, elected officials or agents.
- 1.7 Disability** means, as defined by the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005 (AODA):
- 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 guide dog or other 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, or

- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace and Insurance Act, 1997.
- 1.8 Mobility Aid** means a device used to facilitate the transport, in a seated posture, of people with disabilities.
- 1.9 Mobility Assistive Device** means a cane, walker or similar aid.
- 1.10 Service Animal** means 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 college regulated profession, such as a doctor, nurse, social worker, etc. confirming that the person requires the animal for reasons relating to the disability.
- 1.11 Support Person** means 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 services.
- 1.12 Town** means the Corporation of the Town of Whitby, including its boards and committees.

2 Responsibilities

- 2.1** All Town employees, elected officials, volunteers and anyone performing work on behalf of the Town of Whitby will ensure reasonable efforts are made to provide goods and services in a manner that respects the independence and dignity of persons with disabilities. Equal opportunity shall be given to all persons to use, benefit and obtain the goods and services provided by the Town.
- 2.2** The delivery of goods and services to persons with disabilities shall be:
- Emphasized through mandatory training on Accessible Customer Service;
 - Made accessible by the use of service animals, support persons, assistive devices, unless otherwise prohibited by law; and,
 - A component of the Town's standard business practice.
- 2.3** The Town of Whitby will use reasonable efforts to ensure that the provision of its goods and services are consistent with the following guiding principles:
- The Town's goods and services are provided in a manner that respects the dignity and independence of customers with disabilities;

- The provision of the Town's goods and services to customers with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a customer with a disability to obtain, use or benefit from the Town's goods or services; and,
- Customers with disabilities are given an opportunity equal to that of customers without disabilities to obtain, use or benefit from the Town's goods and services.

2.4 Providing goods, services or facilities to people with disabilities

- The Town of Whitby is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. In addition to meeting the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards.
- The Town of Whitby is committed to excellence in serving all customers including people with disabilities.
- Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

3 Procedure

3.1 Assistive Devices

- a) People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.
- b) In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, staff will work with the customer to determine another measure that will be used to ensure the person with a disability can access our goods, services or facilities.
- c) We will ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

3.2 Communication

- a) We will communicate with people with disabilities in ways that take into account their disability. This may include but are not limited to the following:
 - Large Font (size required);
 - Braille;
 - Audio;
 - American Sign Language Interpreter; and,

- Electronic Version.
- b) We will work with the person with a disability to determine what method of communication works for them.
- c) Staff will provide alternative formats and communications supports in compliance with the Town's Accessible Format and Communication Supports policy and procedure.

3.3 Service Animals

- a) We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public, unless otherwise prohibited by law (i.e. where food is being prepared or in public pools).
- b) A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.
- c) When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
 - College of Chiropractors of Ontario
 - College of Nurses of Ontario
 - College of Occupational Therapists of Ontario
 - College of Optometrists of Ontario
 - College of Physicians and Surgeons of Ontario
 - College of Physiotherapists of Ontario
 - College of Psychologists of Ontario
 - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario
- d) If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:
 - explain why the animal is excluded; and,
 - discuss with the customer another way of providing goods, services or facilities.

3.4 Support Persons

- a) A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.
- b) If a fee or fare is normally charged to a customer for accessing your goods, services or facilities, choose one of the following policy options:
 - Fee/fare will not be charged for support persons.
- c) In certain cases, the Town of Whitby might require a person with a disability to be accompanied by a support person for the health or safety reasons of:
 - the person with a disability; and/or
 - others on the premises.
- d) Before making a decision, the Town of Whitby will:
 - consult with the person with a disability to understand their needs;
 - consider health or safety reasons based on available evidence; and,
 - determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.
- e) If the Town of Whitby determines that a support person is required, we will waive the admission fee or fare [if applicable] for the support person.

3.5 Notice of Temporary Disruption

- a) In the event of a planned or unexpected disruption to services or facilities for customers with disabilities the Town of Whitby will notify customers promptly. Notices will provide the following information:
 - the reason for the temporary disruption, such as repairs, maintenance, construction, inclement weather or unexpected circumstances;
 - the expected length of the temporary disruption; and,
 - alternate means of accessing the goods or services, if available. For example, an alternative accessible route or entrance.
- b) All Town employees will post a notice of service disruption using the Town template(see Appendix 1).

3.6 Format and Placement of Notices

- a) Notices will be posted in a manner that is reasonable under the circumstances with consideration given to the disability(s) of customers who access the disrupted service or facility;

- b) Notices may be provided in print by signage, or in the local newspaper; or electronically by website postings; or by telephone recordings; or in certain situations notice may be provided directly to specified customers, or by other reasonable methods;
- c) Visual notices will be provided in large clear print, using contrasting colours between text and background;
- d) Notices may be placed at entrances, structures and departments where temporary disruption occurs;
- e) Notices may be posted at the site of the temporary service or facility disruption;
- f) Notices will be posted in obvious places. Reasonable efforts will be taken to ensure an unobstructed view of the notice;
- g) Staff should be cognizant of placing notices where they are visible to persons who may be using assistive devices, such as wheelchairs; and,
- h) Staff should be mindful of maintaining the secure placement and visibility of notices. For example, inclement weather may affect the visibility of notices.

3.7 Departmental Responsibilities for Temporary Disruptions

- a) Upon becoming aware of a disruption in a service or facility regularly used by persons with disabilities, staff will notify the department responsible for the service or facility so that they may follow the notification procedures.
- b) Department managers and/or supervisory staff will:
 - Determine the expected length of the temporary disruption and provide this information to the public;
 - Determine the most appropriate and reasonable format(s) of providing notice, giving consideration to the potential disabilities of customers who use the facility or service, and the length of the disruption;
 - Determine the most appropriate location(s) for the notice;
 - Review alternative means of accessing the affected Town goods and services;
 - Determine if an existing alternative is reasonable under the circumstances, giving consideration to: the appropriateness of the alternative, the cost, the effect(s) on the customer and others, the ability of the customer and others to access the service, the availability of the alternative, and associated health and safety considerations; and,
 - Provide information about the reason for the disruption and reasonable alternatives for customers with disabilities.

- See Appendix 1 for the Town's Service Disruption Notice Template.

3.8 Providing Assistance to Customers During Temporary Disruptions

- a) Customers with disabilities may need assistance accessing Town goods and services during a temporary disruption. In such circumstances, the following should occur:
 - Customers requiring assistance should make themselves known to Town staff; and,
 - Staff should provide reasonable assistance to customers with primary consideration being given to the health and safety of all involved.

3.9 Training

- a) The Town of Whitby will provide accessible customer service training to all Town of Whitby employees (including individuals responsible for policy development), elected officials, and volunteers.
- b) Staff will be trained on accessible customer service as soon as practicable after being hired.
- c) Training will include:
 - the purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and its standards as well as other standards covered under the Accessibility for Ontarians with Disability Act and the Ontario Human Rights Code;
 - the Town of Whitby's policies related to the customer service standard;
 - how to interact and communicate 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 a support person;
 - how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities; and,
 - what to do if a person with a disability is having difficulty in accessing the Town of Whitby's goods, services or facilities.
- d) Staff will also be trained when changes are made to our accessible customer service policies.
- e) Records of training will be completed and maintained by the Human Resources Department, that includes the following required information:

- maintain written records of all training done to meet the accessibility requirements that apply to your organization; and,
- record when the training was delivered and how many people took the training.

3.10 Feedback Process

- a) The Town of Whitby welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.
- b) Customers will be notified of how to provide feedback in the following ways:
 - in person;
 - by telephone/TTY;
 - in writing;
 - by email; or,
 - by any other communication technology, as required.
- c) Customers who wish to provide feedback on the way the Town of Whitby provides goods, services or facilities to people with disabilities can provide feedback in the following way(s):
 - in person;
 - by telephone/TTY;
 - in writing;
 - by completing the feedback form located on the Town's website;
 - by email; or,
 - by any other communication technology as required.
- d) All feedback, including complaints, will be handled in the following manner:
 - The Town will record details of the customer's feedback or complaints about the delivery of the Town's goods and services and will forward them to the appropriate department, division, or individual(s).
 - All complaints will be logged centrally through the Town website.
 - Any complaints that deal specifically with accessibility related issues shall be brought to the attention of the Accessibility Coordinator for advice, if applicable.
 - Accessibility related complaints received at customer reception areas shall be recorded and documented or forwarded through the Town website. Centralized record keeping and tracking is required in order to maintain a high level of customer service.

- When agents and others providing goods and services on behalf of the Town receive customer feedback or complaints about the accessibility of the Town's goods and services to customers with disabilities, all information should immediately be forwarded to the Town staff or manager to whom they report.
- e) The Town will attempt to address all complaints at the point of service delivery. Town employees who interact with customers on a regular basis, based on the training they receive, are encouraged, to the best of their ability, to address and resolve customer complaints as they arise.
 - f) The Town of Whitby will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.
 - g) Information pertaining to the customer, their complaint, and/or persons who may be named in the complaint will be held in confidence subject to the Town's obligation to conduct a thorough investigation. Such information may be disclosed in accordance with Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) or as may otherwise be required by law. If a customer wishes to have a support person present during the complaint process, the support person may be required to sign a confidentiality agreement.

3.11 Notice of Availability of Documents

- a) The Town of Whitby will notify the public that documents related to accessible customer service, are available upon request by posting a notice in the following location(s)/way(s):
 - on the Town's website;
 - at all service counters; and,
 - in any other public location deemed appropriate.
- b) The Town of Whitby will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

3.12 Modifications to This or Other Policies

- Any policies of the Town of Whitby that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

Appendices

Appendix 1 Service Disruption Notice Template

Matthew Gaskell, Chief Administrative Officer, x2211

January 26, 2024

Date



Town of Whitby

Notice of Service Disruption

Purpose:

Click here to enter text.

Reason:

Click here to enter text.

Dates of the Work:

Work Begins: Click here to enter a date.

Expected completion date: Click here to enter a date.

Departments Impacted:

- Click here to enter text.

Alternative Service Available:

- Click here to enter text.

Questions or requests for further information please contact:

Click here to enter text.