

	<b>Accessibility Standard for Customer Service Policy</b>
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**BACKGROUND:**

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is a Provincial act aimed at creating a more accessible Ontario by identifying, and to every extent possible, preventing and eliminating barriers experienced by persons with disabilities. The Accessibility Standard for Customer Service has been established under AODA to set accessibility standards and to ensure that goods and services are, wherever possible, equally accessible to every Ontarian.

**PURPOSE:**

The Crupi Group is committed to providing accessible services in a manner that respects the dignity and independence of people with disabilities. The Crupi Group strives to ensure that people with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from the Crupi Group's goods and services. To ensure the best possible customer service, the Crupi Group encourages open two-way communication and expects customers with disabilities to communicate their needs for accommodation or assistance if it is not readily apparent how that need can be met. This policy establishes practices and procedures for the provision of goods and services to people with disabilities. The Crupi Group recognizes its obligations under the Accessibility Standards for Customer Service and enforces the following policy to ensure that all customers, including those with disabilities, have access to goods and services the Company offers.

**SCOPE:**

This policy applies to all areas of the Crupi Group that interact with and provide services to the public in Ontario and is effective August 1, 2013. Management reserves the right to update, amend or add to this policy as necessary, ensuring any changes take into consideration the impact on people with disabilities, their dignity and independence. If any changes are made to the policy, all employees affected will be notified. The Accessible Customer Service Policy will be reviewed and/or amended when additional accessibility related regulations are enacted by the Government of Ontario, or as required.

## **1.1 COMMUNICATION**

The Crupi Group strives to communicate with customers with disabilities in ways that take into consideration their disabilities and their preferred method of communication.

- a) Customers with disabilities will be offered alternative communication formats that will meet the needs of the customer as promptly as feasible;
- b) Documents will be provided to customers in an alternative format that will meet the needs of the customer in a timely fashion, and
- c) If telephone communication is not suitable for customer's needs, alternative forms of communication will be offered as required.

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

The Crupi Group will strive to ensure that the access, use and benefit of goods or services are not compromised for customers with disabilities who require assistive devices, or who are accompanied by a service animal or support person.

### **1.2.1 SERVICE ANIMALS**

Service animals are animals which have been trained to assist people with different kinds of disabilities to overcome barriers. Service animals accompanying a customer with disabilities shall be permitted entry to all of the Crupi Group's facilities that are open to the public or other third parties, unless the service animal is otherwise excluded by law. It is the responsibility of the customer using the service animal to ensure that the service animal is kept in control at all times.

In the case where the Crupi Group cannot permit a service animal access to a facility or meeting room, other accommodations may be provided to the customer such as: alternate meeting format, time or location. The Crupi Group's employees will receive training on how to interact with customers with disabilities who are accompanied by a service animal.

### **1.2.2 ASSISTIVE DEVICES**

Customers with disabilities are permitted, where possible, to use their own assistive devices when on the Crupi Group's premises for the purposes of obtaining, using or benefitting from our goods or services. Exceptions may occur in situations where the Crupi Group has determined that the assistive device may pose a risk to the health and safety of another person with a disability or the health and safety of others on our premises.

If there is a physical, technological or other type of barrier that prevents the use of an assistive device on our premises, we will first endeavour to remove that barrier. If we are not able to remove the barrier, we will ask the customer how he/she can be accommodated and what alternative methods of service would be more accessible to him/her. We will make every effort to provide an alternative means of accessibility to the customer.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times. The Crupi Group will ensure that staff receives training on various assistive devices that may be used by customers with a disability while accessing our goods and services.

### **1.2.3 SUPPORT PERSONS**

The Crupi Group is committed to welcoming customers with disabilities who are accompanied by a support person. Any customer with a disability who is accompanied by a support person will be allowed to enter the Crupi Group's premises with his or her support person. At no time will a customer with a disability who is accompanied by a support person be prevented from having access to his or her support person while on Crupi Group premises.

If a support person is necessary for the health and safety of a person with disabilities, or for the health and safety of other persons, the Crupi Group will require the accompaniment of a support person on Crupi Group premises. Where a Crupi Group employee believes that a support person should be in attendance to protect the health and safety of the customer with disabilities or others, the following criteria shall be used in consulting with the customer:

- Whether there is a significant risk to the health and safety of the customer with a disability or to others (the mere possibility of risk is insufficient)
- Whether the risk can be eliminated or reduced by other means
- Whether the assessment of risk is based on consideration of the duration of the risk, the nature and severity of potential harm, the likelihood that the potential harm will occur, and the imminence of potential harm
- Whether the assessment of the risk is based on the customer's actual characteristics, not merely generalizations, misperceptions, ignorance or fears about a disability.

A customer with a disability is required to provide his or her own support person. A customer who requires the assistance of a support person is also expected to inform the Crupi Group that he or she will be attending with a support person.

## **2.0 TEMPORARY DISRUPTION TO FACILITIES OR SERVICES**

In the event that a temporary service disruption occurs that would limit a customer with a disability from gaining access to the Crupi Group's facilities, goods or services, the Crupi Group will make the disruption known to customers in the following ways:

- a) The Crupi Group will post notice of the service disruption on premises in the area where the service disruption has occurred.
- b) Notice may notify customers of the service disruption by means of recorded message, physical posting at the location or other reasonable means in the circumstances.

In the event of an unexpected service disruption, notice will be provided as soon as possible. Notices will include information about the nature of the disruption, the reason for the disruption and a description of alternative facilities or services if available.

### **3.0 TRAINING & RECORDS**

The Crupi Group will provide training as required under the AODA to all Crupi Group staff to whom this policy applies as well as to those persons charged with developing this policy and related procedures and practices.

Training will include:

- A review of the purposes of the AODA and requirements of the Customer service Standard
- Instruction on how to interact and communicate with customers with various types of disabilities
- Instruction on the use of available technology and assistive devices, and on interaction with service animals and support persons
- Instruction on how to use equipment and devices made available on our premises to assist customers with disabilities to obtain, use or benefit from our goods and services
- Instructions on what to do if a person with disabilities is having difficulty accessing services
- Instruction on the content and requirements of the Crupi Group's policies, practices and procedures relating to the Customer Service Standard

Updated training will be provided as policies, practices and procedures change. Records of training provided to staff, including training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of the AODA.

### **4.0 FEEDBACK PROCESS**

The Crupi Group's AODA Customer Service Policy will be made available to the public and customers upon request. The Crupi Group will provide documents, or the information contained in the documents, required to be provided under the Customer Service Standard to a customer with a disability in a format that takes into account the customer's disability.

The Crupi Group aims to meet service expectations for all of its customers, including those with disabilities. The organization welcomes feedback on how client expectations are being met and uses it as an opportunity to learn and improve. Feedback regarding the way the Crupi Group provides goods and services to people with disabilities can be made in person, by telephone or through email [accessibility@crupigroup.com](mailto:accessibility@crupigroup.com). All feedback is to be directed to the Human Resources Manager. Customers will be responded to in a timely and accessible manner and can expect to hear back within no more than 2-3 business days.

## **DEFINITIONS:**

**Accessible** means capable of being entered or reached, approachable, easy to get at; obtainable; information is able to be understood or appreciated.

**Assistive Device** means a device or aid used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Customer Service Standard. This term applies to technical aids, communication aids, cognition aids (reading, listening, talking aids), personal mobility aids and medical aids (i.e. canes, crutches, wheelchairs, hearing aids, etc.) that is used to increase, maintain or improve the functional abilities of people with disabilities to access and benefit from the goods and services offered by the Company.

**Barrier** refers to 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, a technological barrier, a policy, procedure or practice.

**Disability**, as defined by the Accessibility for Ontarians with Disabilities Act, 2005 and the Ontario Human Rights Code, is:

- 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, 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 a 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.

**Service Animals** as defined by the Accessibility for Ontarians with Disabilities Act, 2005 are service animals for a person with disabilities 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.

**Support Persons** as defined by the Accessibility for Ontarians with Disabilities Act, 2005 shall mean any person whether a paid professional, volunteer, family member or friend who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.