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ACCESSIBLE CUSTOMER SERVICE

POLICY

Canadian Mental Health Association is committed to being responsive to the needs of all individuals. We strive to provide quality goods and services that are accessible to all. The purpose of this policy is to establish guidelines on providing goods and services to people with disabilities that will facilitate accessibility to goods and services for individuals with disabilities.

This policy establishes accessibility standards for Customer Service in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 and in keeping with Ontario Regulation 429/07 – Accessibility Standards for Customer Service.

Canadian Mental Health Association will make reasonable efforts to ensure policies, practices and procedures and the delivery of goods and services provided to persons with disabilities are in keeping with the principles of dignity, equity/equality of outcome, independence and integration and we will communicate with people with disabilities in ways that take into account their disability and communication needs.

Definitions:

Assistive Devices

Devices 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. Assistive devices include, but are not limited to wheelchairs, reading machines, recording machines, hearing devices and devices for gasping, cane. (AODA, 2005)

Barrier

As defined by the Accessibility for Ontarians with Disabilities Act, 2005, 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, procedure or practice.

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

1. Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth effect 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, 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,
2. A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
3. A mental disorder, or

4. 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; For the purpose of this policy, a 'service animal' is defined as either:

1. A "guide dog," as defined in Section 1 of the Blind Persons Rights' Act; or
2. A "service animal" for a person with a disability. For the purpose of this policy, 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 confirming that the person requires the animal for reason relating to the disability

Support Person

A support person is defined as another person who accompanies a person with a disability in order to help him or her with communication, mobility, personal care or medical needs or with access to goods or services.

PROCEDURES

CMHA is committed to excellence in serving all individuals including people with disabilities and we will carry out our functions and responsibilities in the following areas:

Communication:

We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities in person, over the telephone or through written communication.

We are committed to providing fully accessible telephone service to our customers.

We will offer to communicate with individuals in person, email or fax if telephone communication is not suitable to their communication needs or is not available.

Assistive Devices:

1. People with disabilities may choose to use their own personal assistive devices, while accessing goods and services. CMHA acknowledges the importance of these devices and will allow people with disabilities to use their own personal assistive devices to obtain, use or benefit from the services offered by CMHA.
2. Should be a person with a disability be unable to access CMHA's services through the use of their own personal assistive device, CMHA will assess service delivery and potential service options to meet the needs of the individual within financial and human resource allocations.
3. CMHA staff, third party contractors and others who provide service to individuals/customers will be familiar with the assistive devices and other accessibility supports at CMHA that will increase the accessibility of our services to people with disabilities.

Billing:

We are committed to providing assessable invoices to all individuals. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, email.

We will answer any questions individuals may have about the content of the invoice in person, by telephone or by email.

Service Animals:

1. CMHA acknowledges the vital relationship and dependency which exists between a person with disabilities and their service animal. CMHA is committed to welcoming people with disabilities who are accompanied by a service animal on parts of the premises that are open to the public and other third parties. If not readily apparent that the animal is a service animal by the person for the reasons relating to his or her disability, we may ask the person to provide a letter from a physician or nurse confirming that the person require the animal for reasons relating to the disability of other document such as: a certificate or identification card from a service animal training school, an identification card from the Attorney General of Ontario.
2. Public areas of our premises include common areas such as lobby, laundry facilities, recreational facilities, building office, common eating areas, meeting rooms etc. Service animals are not permitted where food preparation is being undertaken; or as otherwise disallowed by law and/ or other resident's private space unless at the discretion of the resident.
3. The individuals/customer when accompanied by a service animal will be allowed to enter the premises with the animal and keep the animal with him or her at all times, unless the animal is excluded by law from the premises.
4. The individual/ customer is responsible for the care, supervision and control of their service animal while on the premises.
5. Individuals will not touch a service animal without permission and will not speak to a service animal while is it working.
6. Staff will notify individuals who use a service animal of areas designated for service animal's to relieve themselves and communicate the policy that the individual is responsible for supervision and care of their service animal.

Support Persons:

1. CMHA is committed to welcoming people with disabilities who are accompanied by a support person. People with disabilities have the right to have access to their support person while accessing goods and services of CMHA.
2. If confidential information is going to be discussed, the person with the disability should be asked if they prefer their support person to remain present. If the support person is present when confidential information is to be disclosed, signed consent must be received from the person with the disability. A signed confidentiality agreement should also be obtained from the support person. See [Consent for Presence of Support Person/Confidentially Form](#). Written documentation will be provided outlining support persons expectations. See [Accessibility for Customer Service: Support Persons Guidelines and Expectations](#).
3. CMHA may request a person with a disability be accompanied by a support person, in the event that it is considered necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises. This will only occur after consultation with the person with a disability and when it is the only means to allow the person with a disability and when it is the only means to allow the person with a disability to access CMHA's goods or services. The following criteria shall be used in consulting with the tenant/customer:

- a) When the risk is greater than the risk associated with other individuals;
 - b) When there is a clear and significant risk to the health and safety of the person with a disability or others;
 - c) When the risk cannot be eliminated or reduced by other means;
 - d) When the assessment of the risk is based on consideration of the nature and severity of the potential harm, the duration of the risk, the likelihood that potential harm will occur and how imminent the potential risk is;
 - e) When the assessment of risk is based on the person's actual characteristics, not on perceived risk.
4. If there are any fees for admission (ie. Special events), support persons may be required to pay their entry fee. Advanced notice of such fees will be publicized prior to event.

Notice of Service Disruptions:

1. If there is a temporary disruption in the availability of services and facilities used by individuals (e.g., temporary loss of elevator service), CMHA will notify the public of the reason for the disruption, the date(s) of disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.
2. This notice may be provided by a variety of methods, depending on the circumstances, and may include postings in conspicuous places at the affected premises (which may include all sites). (For example common areas by the elevator, next to the elevator on the main floor), and the CMHA website, <http://www.cmha-sm.on.ca>, as well as by other means that will ensure that the notice reaches those persons potentially affected by the temporary disruption. Notices will be posted and visible to all individuals.
3. If the disruption is anticipated, a reasonable amount of advance notice of the disruption will be provided. If the disruption is unexpected, notice will be provided as soon as possible. See [Notice of Disruption](#).

Feedback:

1. CMHA is committed to providing high quality customer service and wants to continue to enhance and improve the accessibility of our customer service to all individuals, applicants for housing, visitors, members of the community who use our facilities, and other members of the public with disabilities.
2. A process to receive feedback on the provision of goods and services to tenants/customers with disabilities accessing services at CMHA has been established. This process enables people to provide feedback either in person, by telephone, in writing, by email, online, on disk or by another method.
3. A Feedback Form can be filled out online on our website (provide website address), downloaded in accessible formats from the website, or a copy of the form can be picked up in our building office. The feedback form is available in alternate formats when requested. See [Feedback Form](#).
4. Responses to feedback received are not mandatory. If a person who submits feedback requests a response and provides contact information, CMHA will follow-up with the individual in the format in which the feedback was received, within 5 working days. All feedback will be kept in the strictest confidence and will be used to improve customer service. Feedback forms can be submitted to front reception and will be forwarded to the Director of Operations for review and response. All reviewed forms will be filed under feedback file in file room.

Training:

1. All individuals who interact and deal with members of the public or other third parties on behalf of CMHA, whether the person does so as an employee, agent, volunteer or otherwise shall be required to receive training on providing customer service to people with disabilities.
2. CMHA shall ensure that employees and volunteers who deal with the public on behalf of CMHA, and those who are involved in CMHA's policy and program development and/or in directing, monitoring or evaluating policies receive training on accessible customer service.
3. All third party contractors who deal with the public or other third parties on behalf of CMHA shall ensure that their employees, agents, subcontractors, etc. receive training in accordance with this policy and the Accessible Standards for Customer Service, Ontario Regulation 429/07 and upon request, shall provide the training records to CMHA.
4. CMHA employee/volunteer and third party contractor training will include a review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005, S.O 2005, c11 and the Accessible Standards for Customer Service Ontario Regulation 429/07, the requirements of this policy, and any other organizational policies, practices and procedures regarding the provision of goods and services to person with disabilities and instruction about the following matters:
 - a) How to interact and communicate with people with various types of disability;
 - b) How to interact with people with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person;
 - c) How to use equipment or devices available on CMHA's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability; and
 - d) What to do if a person with a particular type of disability is having difficulty accessing CMHA's goods or services;
 - e) Instruction on the CMHA's policies, procedures and practices pertaining to the provision of goods and services to persons with disabilities.
5. Customer Service training can take various forms including as a part of an orientation or as a separate training program. The training can be provided through handouts at an orientation session, in a classroom setting, by video or through other formats.
6. CMHA will provide training to each person as soon as practicable after he or she is assigned the applicable duties. Training will also be provided on an ongoing basis in connection with changes to applicable legislation, and/or organizational policies, procedures and practices governing the provision of goods or services to person with disabilities. See Training Record.
7. As required, by Accessible Standards for Customer Service, Ontario Regulation 429/07, CMHA will log and maintain records which will record the details of the training provided, as well as the name of the person, location, and date the training was completed.

REFERENCE DOCUMENTS

AUTHORITY: CEO