CENTENNIAL OPTICAL LIMITED

Accessibility for Ontarians with Disabilities Act (AODA)

Customer Service Standard Policy

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Section I: Purpose and Objectives

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was passed with the goal of creating standards to improve accessibility across the province of Ontario. It is designed to benefit all Ontarians by developing, implementing, and enforcing standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises on or before January 1, 2025.

Ontario Regulation 429/07 titled "Accessibility Standards for Customer Service" establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations providing goods and services to members of the public or third parties (organizations, businesses, etc).

The Management of Centennial Optical Limited is fundamentally interested in creating an inclusive environment for our business partners and employees and will ensure equitable treatment with respect to employment, services, goods, facilities, and accommodations. Centennial Optical Limited will make every effort to provide accessible services to its customers by following the standards outlined by the AODA. This policy addresses the following:

- The provision of goods and services to persons with disabilities.
- > The use of assistive devices by persons with disabilities.
- ➤ The use of service animals by persons with disabilities.
- ➤ The use of support persons by persons with disabilities.
- Notice of temporary disruptions in services and facilities.
- > Training for employees
- Customer service feedback regarding the provision of goods and services to persons with disabilities.
- Notice of availability and format of documents.

This policy was developed to support employee and customer understanding, as well as awareness of the appropriate procedures required to decrease service barriers and provide effective, accessible services. From this policy, Centennial Optical Limited and its employees will be able to practice and adhere to the legislated standards of the AODA and Regulation 429/07.

Section II: Definitions from AODA

The definition of a disability under the AODA is the same as the definition of disability in the Ontario Human Rights Code:

"Disability" means,

- 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, brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, or physical reliance on a guide dog or other animal or on a wheel chair 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 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 Safety and Insurance Act, 1997.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

- ❖ Information about a disability is personal and private and as such, must be treated with confidentiality. In most cases it will not be necessary to ask for proof of disability. Through implementing the Customer Service Standard, accessibility will simply become part of an everyday service delivery. Some services may require proof due to the type of services they provide (example: educational institutions).
- "Accessible" shall mean capable of being entered or reached, approachable; easy to get at; capable of being influences, obtainable; able to be understood or appreciated.
- "Assistive Device" shall mean a device 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.
- "Dignity" shall mean respecting and treating every person including persons with a disability as valued and as deserving of effective and full service as any other customer.

- "Independence" shall mean freedom of control or influence of others, freedom to make your own choices.
- "Guide Dogs" shall mean a dog trained as a guide for a person who is blind and having qualifications prescribed by the regulations.
- "Goods and Services" shall mean goods and services provided by Centennial Optical Limited.
- "Service Animals" shall mean animals that are used as a service animal for a person with a disability. 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 animals for reasons relating to the disability.
- "Support Person" shall mean an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs, or with access to goods or services. A support person may be a paid professional, a volunteer, a friend, or a family member.

Section III: Providing Goods and Services

Centennial Optical Limited is dedicated to providing excellent service to all customers, including individuals with disabilities. Centennial will carry out its functions and responsibilities to ensure that policies, practices, and procedures are consistent with the following principles:

- Centennial Optical Limited provides goods and services that respect the dignity and independence of persons with disabilities.
- ➤ The provision of Centennial's goods and services to persons with disabilities is integrated with those provided to individuals without disabilities. If complete integration is not possible, an alternate measure will be taken to ensure that the individual receives, uses, and benefits from goods and services offered in an equally effective way.
- Centennial Optical will ensure that persons with disabilities are given equal opportunity (same options, benefits, and results) to that given to others to obtain, use, and benefit from goods and services provided.
- ➤ To ensure that customers receive optimal service, Centennial encourages open two-way communication and expects persons with disabilities to communicate their need for accommodation or assistance if it is not readily apparent how that need can be met.

Section IV: Communication

Centennial Optical Limited is committed to communicating with persons with disabilities in ways that take into consideration their disability and individual needs or requirements. To ensure this, Centennial will implement the following:

- Centennial staff will be trained in how to interact and communicate with customers with disabilities guided by the principles of dignity, independence, and equality.
- Whenever possible, persons with disabilities will be asked directly how to communicate with them to ensure their needs are met in a respectful, considerate manner.
- Centennial staff will consider the unique needs and circumstances of the individual and will not make general assumptions based on an individual's disability.
- Considerations in how the communication is delivered will be made to ensure accessibility. This includes the language used (ex: plain language that is easily understood), the method used (phone, online, hand outs, audio format, etc) and utilizing assistive devices or services when required (amplifying devices, magnifying devices, sign language interpreter, etc).
- Consideration for the nature of the communication will be made; finding a suitable communication method based on the situation or circumstances of the provider and the person with the disability.
- Customers with disabilities will be provided alternative forms of communication when required that will meet their needs as promptly as feasible.
- Documents will be provided to customers with disabilities in alternative formats upon request.
- ➤ If telephone communication is not suitable for customer's needs, alternative forms of communication will be offered as required.

Section V: Use of Support Services, Resources and Devices

Centennial Optical Limited will ensure that the access, use, and benefit of goods and services are not compromised for persons with disabilities who require assistive devices, or who are accompanied by a service animal or support person.

V.i Service Animals

Service animals, such as, but not limited to Guide dogs, Hearing dogs, Seizure Response dogs, and other certified service animals shall be permitted entry to all of Centennial Optical facilities that are open to third parties.

In the rare case where a service animal is denied access to a facility (such as if another individual on the premises has an allergy that would impact their health and safety), other accommodations may be afforded, such as:

- Alternate meeting format (ex: teleconference).
- Alternate location or time in the delivery of goods and services.
- > Other assistive measures available to deliver goods and services to ensure quality outcome.

V. ii Assistive Devices

Persons with disabilities shall be permitted to obtain, use, or benefit from goods and services through the use of their own assistive devices. Exceptions may occur where the organization has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises. In these situations, if an individual with disabilities ability to access goods and services is compromised, Centennial will accommodate him or her by providing an alternative that will encompass an equal use, benefit, and result for the person whenever possible.

Centennial emphasizes 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.

Centennial Optical Limited will ensure that employees are trained as required to use assistive devices that may be available on the premises. These may include, but are not limited to, computers and software.

V. iii Support Persons

Centennial Optical Limited permits customers with disabilities who require a support person to bring that person with them while accessing goods and services on the premises. The support person is allowed to enter those areas that third parties are permitted to enter.

In some cases a support person may have to sign a confidentiality agreement dependent on the information to be discussed, specifically where confidentiality is vital for the business or for the customer being served.

In cases where a support person is required for the health and safety of a person with disabilities, or for the health and safety of others within Centennial, the company will require the accompaniment of a support person on the premises.

The customer shall determine whether a support person is necessary, however, where an employee believes that a support person should be in attendance to protect the health and safety of the customer or others, the following criteria will be used in consulting with the customer:

- ➤ When there is a <u>significant</u> risk to the health and safety of the person with a disability or others (potential or mere risk is insufficient).
- When the risk cannot be eliminated or reduced by other means.

- ➤ When a risk assessment is conducted based on the duration of the potential risk, the likelihood that harm will result, the nature and severity of the possible harm, and the imminence of the potential harm.
- When the risk assessment is based on the individual's actual characteristics, not on mere generalizations or misconceptions about the disability.

Customers are required to provide their own support person(s) when required. Customers are asked to inform the company that they will be attended by a support person upon entering the premises.

Section VI: Notice of Temporary Disruption to Facilities or Services

In the event that a planned temporary service disruption occurs that would limit an individual with a disability from gaining access to Centennial's facilities, goods or services, the organization will make the disruption known in the following ways:

- ➤ The Human Resources Department will post notice of the service disruption on the premises in the area where the disruption is located.
- Messages will be posted on Centennial's website at <u>www.centennialoptical.com</u>
- Notices of disruption will be announced through Centennial's voicemail system, through email, and through mail.
- ❖ Notice of the known disruption will be made as soon as possible.

Notices will include information regarding the reason for the disruption, its anticipated duration, alternative service locations if applicable, and a description of alternative services or facilities if available from the affected department.

If an unexpected disruption occurs, individuals with disabilities will be accommodated by the use of other possible means to deliver the goods and services. This may include:

- Centennial Optical Limited may use an alternative place and time to provide the goods or services to the individual with a disability.
- Centennial Optical may conduct the goods or services in another format (such as a consult or meeting with a client over the phone, internet, etc).
- Any other appropriate assistive measures available to deliver goods and services.

Section VII: Employee Training

Centennial Optical Limited will provide AODA Customer Service training to all management, employees, volunteers, and others who deal with the public or third parties on its behalf. All those who are involved in the development and approvals of policies, practices, and procedures will also be included in the training. Training will be provided through the Human Resources Department.

As per the regulation standards, training will include a review of the purposes of the Act and the requirements of the Customer Service Standard regulation. Instruction about the following matters must be included:

- How to interact and communicate with persons with various types of disabilities.
- ➤ How to interact with a person with a disability who uses an assistive device or require the assistance of a service animal or support person.
- ➤ How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
- ➤ What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.
- Current policies, practices, and procedures relating to the Customer Service Standard.

Records of the training provided will be maintained and will include the dates on which the training is provided as well as the number of the individuals to whom it was provided to.

Section VIII: Policies Format

Centennial Optical Limited develops and updates policies, procedures, and practices in such a manner as to respect and promote the independence of people with disabilities. The policies and procedures will support integration and equal opportunity for those individuals with disabilities accessing Centennial's goods and services.

Centennial Optical Limited will provide alternate forms of documents regarding its policies and procedures upon request within a reasonable amount of time.

Alternate formats may include: large print versions, audio versions, arrangements for print in Braille, etc.

Section IX: Feedback Processes

The ultimate goal of Centennial Optical Limited is to meet the needs of our customers, while paying attention to the unique needs and requirements of our customers with disabilities. Comments regarding Centennial's services and how well those expectations are being met are encouraged and appreciated.

Feedback should be directed to the Human resources Department. Feedback can be given in person, by telephone, or through email and directed to:

Lina Connor

Human Resources Manager Centennial Optical Limited 158 Norfinch Drive Toronto, ON M3N 1X6

Phone: (416) 739–8539, ext. 4209 lconnor@centennialoptical.com

Resources

Regulation

To view the official wording of the regulation, go to www.e-laws.gov.on.ca and select "Current Consolidated Law" to search "429/07"

Service Canada

For more information or to get regulation documents in an alternate format, contact:

Accessibility for Ontarians with Disabilities Act (AODA)

Contact Centre (ServiceOntario)

Toll-Free: 1-866-515-2025

TTY: 416-325-3408/Toll-free 1-800-268-7095

Fax: 416-325-3407

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