

Customer Service Standards Policy:

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) was passed with the goal of improving accessibility for Ontarians with disability across the Province of Ontario. Through developing, implementing and enforcing standards with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises, accessibility will be achieved on or before January 1, 2025. Disabilities can include physical limitations, mental health, cognitive or intellectual development, learning, hearing, or vision. They also can include epilepsy, substance addictions, environmental sensitivities, and workplace injuries.

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.).

Centennial is fundamentally interested in creating an inclusive environment for our business partners, employees, customers and visitors, no matter where they reside. Through following the standards outlined by the AODA, the Company will ensure equitable treatment with respect to employment, services, goods, facilities, and accommodations.

The AODA Customer Service Standards Policy addresses the following:

- Provision of goods and services
- Use of assistive devices
- Use of service animals
- Use of support persons
- Notice of temporary disruptions in services and facilities
- Training for employees
- Customer service feedback regarding the provision of goods and services
- Notice of availability and format of documents

This policy supports employee and customer understanding and awareness of the appropriate procedures in order to provide effective, accessible services and reduce service barriers.

From this policy, Centennial and its employees will be able to practice and adhere to the legislated standards of the AODA and Regulation 429/07 to protect people from discrimination and harassment because of past, present, or perceived disabilities.

Definitions:

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

“Disability” shall mean,

- 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,
- A condition of mental impairment or a developmental disability,
- A learning disability, or a dysfunction in one or more 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.

Note: This definition includes disabilities of different severity, visible/non-visible disabilities and disabilities the effects of which may come and go.

“Accessible” shall mean capable of being entered or reached, approachable; easy to get at; capable of being influenced, obtainable; able to be understood or appreciated.

“Accommodation” shall mean not denying people jobs or services in the first place if they can be accommodated to the point of undue hardship changes to a company's policies and practices or staff training so that discrimination doesn't recur may be required.

“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 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.

“**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.

Providing Goods and Services:

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

- Centennial 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 persons without disabilities. If complete integration is not possible, an alternate measure will be taken to ensure that persons with disabilities receive, use and benefit from goods and services offered in an equally effective way.
- Centennial will ensure that persons with disabilities are given equal opportunity (same options, benefits and results) to obtain, use and benefit from goods and services provided.
- To ensure that customers receive optimal service, Centennial encourages open two-way communication. Persons with disabilities should communicate their need for accommodation or assistance if it is not readily apparent how that need can be met.

Communication:

Centennial 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:

- Employees will be trained in how to interact and communicate with persons with disabilities guided by the principles of dignity, independence and equality in a timely manner considering the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.
- 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.
- Employees will consider the unique needs and circumstances of the person with disability and not make general assumptions based on the disability.
- Considerations in how the communication is delivered will be made to ensure accessibility. This includes:
 - The language used (e.g., plain language that is easily understood)
 - The method used (e.g., phone, online, handouts, audio format, etc.)
 - Utilizing assistive devices or services when required (e.g., 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 disability.
 - When required, persons with disabilities will be provided alternative forms of communication that will meet their needs as promptly as feasible.
 - Documents will be provided to persons with disabilities in alternative formats upon request.
 - If telephone communication is not suitable for person's needs, alternative forms of communication will be offered as needed.

Use of Support Services, Resources and Devices:

Centennial 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.

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 facilities that are open to third parties.

In the rare case where a service animal is denied access to a facility (e.g., 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 formats (e.g., 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.

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 Centennial 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 persons 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.

The Company emphasizes that it is the responsibility of the person with disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

Centennial 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.

Support Persons:

Centennial permits persons 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 are open to third parties.

In some cases, a support person may have to sign a confidentiality agreement dependent on the information to be discussed (i.e., 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 disability or for the health and safety of others within Centennial, the Company will require the accompaniment of a support person on the premises.

Persons with disabilities shall determine whether a support person is necessary and are required to provide their own support person(s). They are asked to inform the Company that they will be accompanied by a support person upon entering the premises. Where an employee believes 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 significant risk to the health and safety of the person with 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:
 - Duration of the potential risk.
 - Likelihood that harm will result.
 - Nature and severity of the possible harm.
 - 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.

Notice of Temporary Disruption of Facilities or Services:

In the event that a planned temporary service disruption occurs, and as a result, limits a person with disability from gaining access to Centennial's facilities, goods, or services, the organization will make the disruption known in the following ways:

- Human Resources will post notices on the premises in the area where the disruption is located.

- Notices will be posted on Centennial's website at www.centennialoptical.com
- Notices will be announced through Centennial's voicemail system, email and mail.
- Notices will be made as soon as possible.

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

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

- Using an alternative place and time to provide the goods or services to persons with disabilities.
- Conducting the goods or services in another format (such as a consult or meeting with a client over the phone, internet, etc.).
- Using any other appropriate assistive measures available to deliver goods and services.

Employee Training:

Centennial will provide AODA Customer Service training to all management, employees, volunteers and others who deal with the public or third parties on its behalf. 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 Human Resources and 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:

- Purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- Requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429/08).
- Information about Centennial policies and procedures pertaining to the provision of Centennial services to persons with disabilities.
- 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 the 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.

Training will occur on an ongoing basis and whenever changes are made to relevant policies, practices and procedures. Records of the training will be maintained and kept by Human Resources, which will include the date of training, number and names of the participants in attendance.

Policies Format:

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

Centennial 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.

Feedback Processes:

The ultimate goal of Centennial 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:



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA)

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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 Ontario

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
Website: www.AccessON.ca