
Nepean Housing Corporation

**Accessibility For Ontarians with
Disabilities Act**

(AODA)

Policy: 2012 – 2



1.0 Summary

The Province of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA) in 2005, with a vision of having an accessible Ontario by 2025. Ontario's first accessibility standard is the Accessibility Standard for Customer Service Regulation, O.Reg. 429/07. It came into effect on January 1, 2008. A requirement of the Customer Service Regulation is that applicable organizations set up policies, practices and procedures on providing goods or services to people with disabilities.

2.0 Purpose/Objective

The objective of this policy is to set out the policies, practices and procedures of Nepean Housing Corporation (NHC) in providing appropriate service to people with disabilities. NHC will work closely with the Service Manager to address issues that may arise in the execution of this policy.

3.0 Rationale for Policy

The accessibility standards to be addressed by the AODA are Customer Service, Built Environment, Employment, Information and Communications, and Transportation. Standards will be phased in. As at the time of writing this procedure, the first standard to be put into practice is Customer Service. NHC will meet the requirements of this standard and will continually update the procedure as new standards are introduced and information is made available. This procedure will outline the requirements of the Customer Service standard and the action NHC will take to comply.

4.0 Scope and Application

This policy applies to all operations of NHC. Implementation of the policy is the responsibility of the respective department heads and the Executive Director.

5.0 Principles

NHC will apply the policy mindful of community needs and the requirements of the AODA. NHC will adhere to the key principles of the AODA of independence, dignity, integration, and equality of opportunity.

6.0 Policy

Much of the information provided in this policy is obtained from the Ministry of Community Service's website, and, specifically, www.AccessON.ca/compliance. This will minimize the possibility for misinterpretation and contribute to greater clarity.

The requirements of the Customer Service Regulation, as they relate to NHC, include that an organization:

- Set up policies, practices and procedures on providing goods or services to people with disabilities;
- Make reasonable efforts to ensure that policies, practices and procedures are consistent with the key principles of independence, dignity, integration, and equality of opportunity;
- Have a policy about the use of assistive devices;
- Communicate with a person with a disability in a manner that takes into account his or her disability;
- Let people with disabilities bring their service animals onto the parts of the premises open to the public or other third parties except where the animal is otherwise excluded by law (for example, a restaurant kitchen);
- Let people with disabilities bring their support persons with them when accessing goods or services on parts of the premises open to the public or other third parties;
- Let the public know when facilities or services that people with disabilities usually use to access their goods and services are temporarily not available;
- Ensure that certain staff receive training on how to serve people with disabilities, including staff involved in developing customer service policies, practices and procedures and people who deal with the public or other third parties on behalf of the provider;
- Set up a process to receive and respond to feedback, including what action will be taken on any complaints. Make the information about the feedback process readily available to the public.

The Compliance Manual from the website offers practical information and ideas on implementing the requirements of the customer service standard, and includes templates for a policy. The following is the template from the manual, customized for NHC. The words “client” and “customer” will refer to applicants, tenants or other individuals conducting business with NHC.

Customer Service Policy Statement:
Providing Goods and Services to People with Disabilities

1. Our Mission

Nepean Housing Corporation (NHC) is a private non-profit housing provider. We build integrated, community-based affordable housing for persons of diverse backgrounds. We promote strong, healthy, sustainable communities through leadership, corporate excellence and community development.

2. Our Commitment

In fulfilling our mission, NHC strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

3. Providing Goods and Services to People with Disabilities

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

While respecting the privacy of customers, NHC will post appropriate information relating to the needs of the customer on paper and electronic files to ensure staff deal with customers in an individual and respectful manner, mindful of the customer's disability.

3.1 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.

3.2 Telephone Services

We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

We will offer to communicate with customers by e-mail, relay services, or through a third party of their choice (with their consent) if telephone communication is not suitable to their communication needs or is not available.

3.3 Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our staff are sensitive to the needs of these clients and will respectfully assist those clients where practical and where the health and safety of both the staff and the client will not be compromised while accessing our goods or services.

Assistive devices may also include, but not be limited to items such as alternate smoke/fire alarms, door bells, and grab bars. Where the need for one or more of these devices is identified, the client must provide documentation from an attending medical professional detailing the nature of the disability and the specific accommodations that are required to address the client's needs. This documentation will ensure that the applicable devices are installed appropriately in order to safely meet the client's requirements.

3.4 Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices, upon request, will be provided in hard copy, large print or e-mail. We will answer any questions customers may have about the content of the invoice in person, by telephone or email. Where the customer has provided consent, we will deal directly with any third party assisting the customer.

4. Use of Service Animals and Support Persons

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter NHC's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

5. Notice of Temporary Disruption

NHC will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises.

6. Training for staff

NHC completed initial training for staff in December, 2009. However, NHC will continue to provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures. Individuals in the following positions will be trained:

This training will be provided within one month of staff commencing duties.

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of 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;
- What to do if a person with a disability is having difficulty in accessing NHC's goods and services; and,
- NHC's policies, practices and procedures relating to the customer service standard.

Staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

7. Feedback process

The ultimate goal of NHC is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way NHC provides goods and services to people with disabilities can be made by mail, e-mail, verbally, or by the client or through a designated third party. All feedback will be directed to the Director of Administration at 16 Kilbarron Road, Nepean, ON, K2J 5B2, or selene.commerford@nepeanhousing.ca, or 613-823-8452. Customers can expect to hear back within ten days.

8. Modifications to This or Other Policies

We are committed to developing customer service policies that respect and promote the dignity and independence of all people, including those with disabilities. Therefore, no

changes will be made to this policy before considering the impact on people with disabilities. Any policy of NHC that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

9. Questions about this policy

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an inquiry should be referred to the Director of Administration of NHC.

10. Additional Information

Additional information about the Act and Regulations can be obtained at:

Accessibility for Ontarians with Disabilities Act (AODA) Contact Centre (Service Ontario)

Phone: 1-866-515-2025

TTY: 1-416-325-3408

TTY Toll-free: 1-800-268-7095

Fax: 1-416-325-3407

Website: www.AccessON.ca

7.0 Authority/Responsibilities

The Director of Administration and the Director of Property have the authority to deal with issues related to their areas of responsibility, whether with NHC staff or contractors, as well as any responsibilities within their department and financial authority.

The Executive Director (ED) has the authority to deal with issues for direct reports and all other staff in the absence of the Director(s), as well as any responsibilities within those departments and within the ED's financial authority. The ED is responsible for ensuring all staff are trained and adhere to the policy. The ED has ultimate responsibility for circulating and explaining the policy, or designating this responsibility, to all staff, the Board, volunteers, and other affected parties, as well as for the implementation of the policy.

Revision Log

Version #	Version Date	Summary of Change	
1.1	22 Dec 2009	First Draft	
	22 Dec 2009	For Approval by Board 02 14 2012	

Appendix A: Barriers and Solutions

Possible Barriers	Possible Solutions
Vision loss	
Staff are not aware of the need to describe goods or services when a person cannot read a sign.	<ul style="list-style-type: none"> Describe to customers the goods or services offered if they are unable to view them due to vision loss
Deaf, deafened, oral deaf or hard of hearing	
Telephone services not accessible for customers who are Deaf, deafened, oral deaf or hard of hearing	<ul style="list-style-type: none"> Participate in the use of TTY and Relay services in telephone service policies.
Staff are not aware of the need to paraphrase or repeat more slowly what is said to customers when the customer has not understood the message.	<ul style="list-style-type: none"> Paraphrasing and repeat communications more clearly to customers upon request or using other means such as passing notes back and forth.
Speaking to customers with hands covering the mouth which does not allow for lip-reading	<ul style="list-style-type: none"> Speak clearly and make sure that nothing is covering the mouth when communicating with customers who lip-read.
Loud music and poor acoustics, making hearing difficult for people using hearing aids	<ul style="list-style-type: none"> Have a pen and paper available and communicate through note-writing.
Intellectual/Developmental disability	
Use of complicated or technical language in customer service	<ul style="list-style-type: none"> Use plain language and avoid technical language when communicating.
Ignoring customers who are more reserved or afraid to ask for help	<ul style="list-style-type: none"> Build in extra time to deal with customers who need it and adjust the availability of other staff to help out as needed.
Learning disability	
Providing complicated documents to customers without explanation or opportunity to discuss or ask questions	<ul style="list-style-type: none"> Discuss and explain any documentation provided to customers.
Employees who are not flexible in offering alternative communication strategies or adequate time in providing service	<ul style="list-style-type: none"> Break up lengthy conversations into a series of shorter ones. This may assist customers who need additional time to process certain types of information.

Possible Barriers	Possible Solutions
Mental health disability	
Negative stereotypes about people with mental health disabilities resulting in disrespectful or impatient treatment.	<ul style="list-style-type: none">▪ Train staff on the needs of people with mental health disabilities.▪ Break up lengthy conversations into a series of shorter ones and speak more slowly so that some customers will not feel overwhelmed with the information. This may help to prevent anxiety in some customers.▪ Ensure documentation is clear and easy to read
Speech impairment	
Verbal speech is the only form of communication used to interact with customers.	<ul style="list-style-type: none">▪ Have a pen and paper on hand and communicate through note-writing when requested to do so.