

## Accessibility for Ontarians with Disabilities Act, 2005 ("AODA")

### Emco Corporation

#### Accessible Customer Service Policy - Ontario

#### Purpose

To establish policies, practices and procedures to ensure Emco is accessible to customers and others in accordance with Accessibility for Ontarians with Disabilities Act, 2005 (the "Act") including Ontario Regulation 429/7 Accessibility Standards for Customer Service.

#### Policy Statement

Emco Corporation ("Emco") is committed to providing quality goods and services that are accessible to all persons.

Emco will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the Accessible Customer Service principle of dignity, independence, integration and equality of opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk or violate any of our Health and Safety policies;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customers disability.

#### Application

This policy applies to all Ontario employees who deal with the public, other organizations or third parties on or off Emco premises, or who participate in developing Emco policies, practices and procedures governing the provision of goods and services to the public.

#### General Principles and Practices

Emco shall meet its duties and responsibilities under the Act by adhering to the following principles and practices:

1. Assistive Devices

Persons with disabilities may use their own assistive devices as required with accessing goods and services at Emco.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods or services.

## 2. Service Animals

A person with a disability accompanied by a service animal will be allowed access to any places that are open to the public at Emco.

## 3. Support Persons

If a customer with a disability is accompanied by a support person Emco will ensure that both persons are allowed to enter the premises together and the customer will not be prevented from having full access to the support person.

In situations where confidential information might be discussed, consent will first be obtained from the customer, prior to any such conversation or disclosure.

## 4. Communication

Communicate with a person with a disability in a manner that takes into account his/her disability. Asking the person how they would like to be communicated with.

## 5. Training

Training will be provided to all Emco employees in Ontario and those that assist in developing policies and procedures that govern the provision of goods and services to the public .

The training shall include:

- A review of the purpose of the Act
- A review of the requirements of Accessibility Standards for Customer Service (Regulation 429/07)
- How to interact and communicate with people with various types of disabilities
- How to interact with persons with disabilities who use assistive devices, service animals or support persons
- What to do if a person with a disability is having difficulty accessing Emco's good or services and;
- Emco's policies, procedures and practices pertaining to the provision of goods or services to persons with disabilities.

The training will be provided as soon as is practical as well as on an ongoing basis as changes occur to Emco's policies, practices and procedures that govern the provision of goods or services to persons with disabilities and/or when there are changes to the Act.

Records shall be kept for each employee indicating the date and training provided.

### **Notice of Temporary Disruptions**

Emco will give notice of temporary disruptions to services or facilities used by persons with disabilities including the reason for the disruption, the anticipated duration of the disruption and any alternative facilities or services that may be available. The notice shall be posted in a conspicuous place on the premises.

### **Feedback**

Feedback may be provided on the accessibility of the provision of goods and services by Emco in the manner deemed most convenient to:

Accessibility at Emco  
1108 Dundas St. East  
London, Ontario  
N5W 3A5  
Phone 519 453-9600 ext 2203  
e-mail [access@emcoltd.com](mailto:access@emcoltd.com)  
[www.emcoltd.com](http://www.emcoltd.com)

All feedback will be kept strictly confidential and will only be used to improve customer service.

Feedback will be reviewed and changes will be made based upon the information when required.

### **Maintenance**

Policies, practices and procedures pertaining to the Act will be maintained annually.

## Schedule A

### Definitions

**Assistive device:** is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

**Disability** – the term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:

- 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, muteness or speech 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 dysfunction in one of 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.

**Guide Dog** – is a highly-trained working dog that had been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety and increased independence for people who are blind.

**Service Animal** – as defined in Ontario Regulation 429/07, 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 animal for reasons relating to the disability.

**Service Dog** – as defined in Health Protection and Promotion Act, Ontario Regulation 562, a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as service dog for a person with a medical disability; or
- The person who required the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

**Support Person** – as defined in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to good and services.

## Schedule B

### Explanation and Implementation

#### **1.0 Background Information**

The AODA was designed to make Ontario more accessible by indentifying, removing and preventing barriers for persons with disabilities. As a result five standards were set out that will place mandatory requirements on Emco. These include: Customer Service, Information and Communication, Employment, Transportation; and Built Environment.

Each standard has rules we must comply with a goal of making Ontario barrier free by 2025.

#### **1.1 Overview of the Accessibility Standards for Customer Service**

The Customer Service Standard is the first of the five standards to be introduced and is to be in place by January 01, 2012. The standard applies to all people, businesses and organizations that provide goods and services to the public, other organizations or third parties.

The goal is to ensure people with disabilities receive the same access to goods and services as everyone else. It requires that goods and services will be provided under the principles of dignity, independence, integration and equal opportunity. The Standard also mandates communication, assistive devices, guide dogs, service animals, support persons, service disruptions, feedback and training.

#### **2.0 Requirements**

- Establish a policy that complies with the Customer Service Standard.
- Develop procedures and practices that follow guidelines and that are consistent with the core principles of dignity, independence, integration and equal opportunity.
- Communicate with a person in a manner that takes into account their specific disability. Ask the person how they wish to be communicated with.
- Allow customers to use their personal assistive devices.
- Allow customers to be accompanied by their guide dogs.
- Allow customers who are accompanied by support persons to bring that person with them while they are conducting business.
- Provide notice when services that customers with disabilities rely on are unavailable including when the expected length of the disruption, the reason and any alternatives available.
- Develop a feedback process relating to the services and goods received by persons with a disability in a manner that is easiest for that person.
- Train employees on the policy and the customer service standard.
- Train anyone who is involved in the development and approval of customer services policies, practices and procedures.

- Document in writing all of the policies, procedures and practices related to the Customer Service Standard
- Notify customers these documents are available at any time in any location in a format that takes into account their disability.
- Keep a record of all training
- File an online report of compliance by January 01, 2012

### 3.0 Training and Implementation

A major requirement in order to be compliant with Service Regulation 429/07 of the Accessibility for Ontarians with Disabilities Act, 2005 is that all employees be trained and informed on the policies, practices and procedures put in place by the employer. Due to the nature of Emco's business and the distance between its Profit Centres and National Support Centre, the training will initially be led by NSC.

- Training on the Accessible Customer Service Policy will be done every 3 years or whenever new changes to the policy occur. Training on the Accessible Customer Service Policy will be given to all new employees. New employees will have the policy and program explained to them by their manager. They will also have to review the PowerPoint presentation and sign a waiver stating that the policy and program have been explained to them and they have read and understood the contents of the policy.

How will we train our employees at National Support Centre?

- Human Resources will conduct training at the National Support Centre. Training will be in the form of a PowerPoint Presentation to all Managers, Vice Presidents, Directors and employees at the National Support Centre. The presentation will be approximately an hour long and will consist of a review of the policy and a quiz. The presentation will be made available online for future reference.

How will we train our employees at the Profit Centres across Ontario?

- Training at the Profit Centers will be conducted initially by NSC. Human Resources will present the policy and program content to all Managers on a webinar. The training will be followed by question and answer session. Managers will receive the full AODA package, which includes the policy, program contents and applicable forms. Managers will then be responsible for training each of their own Profit Centres. Training on this policy is mandatory and must be done by December 31, 2011.
- Depending on the layout and scheduling of each Profit Centre, Managers will train their employees with the same material they were trained with. They will conduct their training with all employees. They will go through the slides with the employees and emphasize our duties under the Act. Managers will then post the policy and program contents along with applicable forms in a conspicuous place available to all employees and customers.

Where will the policy and its accompanying documents be available?

- The Policy, general program contents and all applicable forms will be available on the Emco Health and Safety Website as well as on Emco's external website.

#### **4.0 Offenses and Penalties for lack of compliance**

Under the AODA, the government has the authority to conduct inspections to ensure compliance. Failure to comply could result in fines as high as \$50,000 per day for individuals and \$100,000 per day for corporations. Regulation C11 S39 (2)

Similar to any other Emco policies employees are expected to be in compliance. Failure to comply will result in discipline, up to and including termination for cause.

## Customer Service Feedback

At Emco we value all our customer and we are always looking for feed back from our customers.

Please print and fill out the [Customer Service Feedback Form](#) and submit to Emco:

Submission methods include:

- Return to you local Emco Branch
- Fax to: (519) 686-4607 Attn: AODA Customer Feedback
- Mail to :  
AODA Customer Feedback c/o Emco Corporation  
1108 Dundas St.  
London, ON  
N5W 3A7



## Training

All Ontario Employees are required to complete the AODA training whether or not you have direct contact with customers.

If you have not received training you can either watch the recorded webinar or read the Power Point presentation (or both).

- [Recorded AODA Webinar](#)
- [AODA Training Power Point](#)

Once you have completed the training you must also fill out the Quiz and submit it to NSC care of Kim Fraser:

- [AODA Quiz](#)

## Compliance

All Emco Locations must display the [AODA Compliance Poster](#) to show that they are in compliance with the Ontario Legislation.

## Disruption in Service

If for any reason a service a customer would rely on is not currently available the Emco Location must post notification of the disruption and record the disruption using the appropriate form and poster:

- [Disruption of Service Form to document incident](#)
- [Disruption of Service Poster](#)