
<u>Section:</u>	Accessibility	Date Approved: April 16, 2015
<u>Subject:</u>	ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICES	Date Reviewed: November 4 th , 2020

Purpose and Background

The Accessibility for Ontarians with Disabilities Act, 2005 (“the AODA”) is a Provincial Act with the purpose of developing, implementing and mandating accessibility standards in order to achieve accessibility for persons with disabilities, with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Under the AODA, Ontario Regulation 429/07, entitled “Accessibility Standards for Customer Service” (“the Regulation”), came into effect on January 1, 2008.

The Regulation establishes accessibility standards specific to customer service for private sector organizations that provide goods and services to members of the public or other third parties.

The objective of this policy is to identify what the equal treatment provisions of the Ontario Human Rights Code, through the AODA and the Regulation, require with respect to service delivery to persons with disabilities and addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices;
- The Use of Guide Dogs and Service Animals;
- The Use of Support Persons;
- Notice of Service Disruptions;
- Customer Feedback;
- Training;
- Notice of Availability and Format of Required Documents.

Statement of Commitment and Accountabilities

Commitment

The Tony Graham Automotive Group (referred to as “TGAG”) is committed to providing a respectful, welcoming, accessible, and inclusive environment in the provision of goods and services for both customers/clients and employees alike. TGAG is committed to, and strives to ensure that, the Accessibility for Ontarians with Disabilities Act (AODA), 2005, the standards and all other relevant legislation concerning accessibility, are rigorously observed. TGAG ensures that all persons within its community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

People with disabilities will be given an equal opportunity to obtain, use and benefit from TGAG’s products and services in a way that is respectful of the dignity and independence of people with disabilities and in a manner which takes into account the person’s disability.

All goods and services provided by TGAG shall follow the principles of dignity, independence, integration and equal opportunity.

TGAG is committed to meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to make full use of the services provided by TGAG. TGAG recognizes that barriers are broken down in part through open, positive attitudes and accepting people for who they are, not what they can or cannot do. Persons with disabilities are to always be treated with dignity and discreetly asked if they require assistance before any assistance actions are taken. For example, do not touch the person's wheelchair or assistive device without permission.

Accountabilities

TGAG Management Team are accountable to and responsible for:

- Fostering open and constructive communication.
- Demonstrating sensitivity to and respect confidentiality of information.
- Raising awareness to facilitate understanding of the policy.
- Participating and co-operating to facilitate workplace accommodation.

TGAG Employees are accountable to and responsible for:

- Participating and cooperating with all parties to facilitate workplace accommodation.

TGAG Human Resources is accountable to and responsible for:

- Participating and cooperating with all parties.
- Acting as a resource for all parties and participants.
- Supporting and educating managers and employees in their obligations under the policy.

Scope

Covered under this policy are employees, agents and/or contractors who deal with the public or other third parties that work directly for TGAG in Ottawa. This policy applies in Ontario to the provision of goods and services at premises owned and/or operated by TGAG as well as any interactions with employees and customer/clients via telephone, email or written mail.

Definitions

Assistive Device:

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 members and guests bring with them such as a wheelchair, hearing aid, walker, and personal oxygen tank, special car attachments that might assist in hearing, seeing, communicating, moving, breathing, remembering, reading and driving. In addition, there are different systems that allow someone who is deaf to use the telephone, such as the Teletypewriter (TTY) or a relay system.

Disability:

Any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- Diabetes mellitus;
- Epilepsy;
- A brain injury;



- Any degree of paralysis;
- Amputation;
- Lack of physical coordination;
- Blindness or visual impediment- There is no need to use special language around people who have vision loss. They use the same expressions as everyone else. Due to the vision loss some may also learn to use their other senses more efficiently.
- Deafness or hearing impediment-- Most people who are deaf or hard of hearing can speech read, but not all do it well. People who are deaf, deaf blind or hard of hearing may choose not to speak because they are unsure of pronunciation, or are concerned that their voices may sound different. Most people who are deaf, deaf blind or hard of hearing can make sounds, and can probably speak some words.
- Muteness or speech impediment; or
- Physical reliance of a guide dog or other animal, or on a wheelchair or other remedial appliance or device. However, not everyone who uses a wheelchair is paralyzed. People might use a wheelchair if they have arthritic spines or sore legs, severe asthma or a heart condition that limits their ability to walk.
- A condition of mental impairment or a developmental disability. However, many types of mental health disabilities are treatable and not necessarily permanent.
- A learning disability or a dysfunction in one or more of the processes involved in understanding. Many people develop ways to work with, or around, their particular type of learning disability. Repeated practice can help a person with a learning disability perform some tasks with less difficulty.
- Or using symbols or spoken language.
- A mental disorder.
- An injury or disability for which benefits were claimed or received under the insurance plan
- Established under the Workplace Safety & 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.
- Intellectual Disability - Unlike mental health disability, intellectual disability is a limitation affecting intellectual capacity, not emotional equilibrium. Also, an intellectual disability is a permanent condition that cannot medically treated or cured.

Some disabilities are a result of a disease; some are inherited; and others are the result of an accident.

This is a broad definition, and one that must be considered closely when educating our employees in the appropriate response to our customers.

Barrier:

As defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- A physical barrier,
- An architectural barrier,
- An informational or communications barrier,
- An attitudinal barrier
- A policy, practice and procedure barrier.

Guide Dog:

A highly trained working dog that has been trained at one of the special facilities to provide mobility, safety and increased independence for people who are blind. They do not read or see colours but rather they send assistance signals to the owner.

Service Animal:

The Regulation₃ defines a “service animal” as “an animal for a person with disability”. In this policy, a service animal is:

- Any animal used by a person with a disability for reasons relating to the disability; or
- Where the person provides a letter from a physician confirming that they require the animal for
- Reasons relating to their disability; or
- Where the person provides a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

Service animals are working and have to pay attention at all times. Don't ever touch or address them.

Support Person:

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 goods and services.

Customer Service Policy, Practice and Procedure

The Provision of Goods and Services to Persons with Disabilities

TGAG will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal 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;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and communicating in a manner that takes into account the customer's disability.

Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by TGAG. 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 and services. For example, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Guide Dogs and Service Animals

A customer with a disability that is accompanied by a guide dog or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. If a

guide dog or service animal is excluded by law, TGAG will try to offer alternative methods to enable the person with a disability to access goods and services, when possible.

Recognizing a Guide Dog and/or Service Animal. If it is not readily apparent that the customer for reasons relating to his or her disability is using the animal, TGAG may request verification from the customer. Verification may include:

- A letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- A valid identification card signed by the Attorney General of Canada; or,
- A certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The customer/client that is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all time.

Support Persons

If a support person accompanies a customer/client with a disability, TGAG will ensure that both persons are allowed to enter the premises together and that the customer/client is not prevented from having access to the support person.

All customer/client confidentiality requirements and practices will also apply to support persons.

Training

Training will be provided to all employees who deal with the public or other third parties that act on behalf of TGAG while on TGAG's premises; revised training will be provided in the event of changes to legislation or TGAG's policy, practice and procedure. TGAG will keep a record of training that includes the dates training was provided, the number of employees and names of employees trained.

The training will include information on the purposes of the AODA, requirements of this Regulation, how to communicate and interact with people with disabilities, how to interact with service animal or support person, how to utilize assisted devices that are available at our premises, what to do if a person has difficulty accessing TGAG services or facilities, and our policies, procedures and practices pertaining to providing accessible customer service to people with disabilities. All employees will review the policy and then take a knowledge based quiz.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of TGAG. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible. Notification will be given by posting the information in a conspicuous place owned and operated by TGAG, the website and/or any other reasonable method. In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration
- A description of alternative services or options

Feedback Process

TGAG shall provide customers/clients with the opportunity to provide feedback on the service provided to persons with disabilities. Information about the feedback process will be readily available to all customers/clients and notice of the process will be made available at reception. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written or email) will be available upon request. Customers can submit feedback to: hr@tonygraham.com.

Availability and Format of Documents (Alternative Formats)

All documents required by the Accessibility Standards for Customer Service, including TGAG's Accessibility Policy, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to the Freedom of Information and Protection of Privacy Act ("FIPPA"). When providing these documents to a person with a disability, TGAG will endeavour to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

TGAG shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the customer's disability.

Administration

Any questions or concerns about this policy or its related procedures can be directed to: hr@tonygraham.com.