

ACCESSIBLE CUSTOMER SERVICE POLICY

SOP No:	HR-037-22	Department:	Human Resources
Issue Date:	June 7, 2022	Supersedes:	March 12, 2021
Owner:	HR Department	Approved by:	HR Manager

1.0 POLICY:

- 1.1 Skyline Group of Companies (collectively, “Skyline”) is committed to excellence in serving all customers including people with disabilities.
- a) Additionally, Skyline is committed to fair and accessible employment practices. Our recruitment, assessment, selection, performance management, career development, redeployment, and return-to-work processes will take into account the accessibility needs of applicants, candidates, and employees with disabilities.
 - b) Employees requiring accommodation should refer to the Skyline Accommodation Policy (HR-096-XX).

2.0 PURPOSE:

- 2.1 The objective of this policy is to meet the requirements in accordance with the Integrated Accessibility Standards (Ontario regulation 165/16) and the Ontario Human Rights Code (R.S.O. 1990, c. H. 19) and all other provincial variants within Canada.

3.0 SCOPE:

- 3.1 This policy applies to all Skyline employees who deal with the public and who develop policy on behalf of Skyline as well as any third-party providing goods and services on behalf of Skyline who may interact with Skyline’s customers, the public or third parties.

4.0 RESPONSIBILITIES:

- 4.1 The Human Resources department will ensure that Skyline implements and updates this policy and related procedures as appropriate.
- 4.2 Executive Management and Managers/Supervisors will ensure that employees and any third party who report to them or conduct business on their behalf are trained on accessible customer service following corporate standards.
- a) Additionally, Executive Management and Managers/Supervisors will ensure that:
 - Procedures under this policy are communicated to staff and are carried out consistently.
 - Feedback from the public regarding accessible customer service is addressed in accordance to the policy and related procedures.
- 4.3 The Marketing department responsible for the maintenance of our websites, will ensure that all external and internal Skyline websites follow the applicable accessible customer service policies and procedures as required and in accordance with AODA legislation.
- 4.4 Employees will ensure that they participate in all accessible customer service training activities and that accessible customer service is provided to all customers in accordance to the policy and related procedures.

5.0 PROCEDURE:

- 5.1 **Guiding Principles:** Skyline is committed to providing accessible customer service to persons who have disabilities. Skyline will make reasonable efforts to ensure that

ACCESSIBLE CUSTOMER SERVICE POLICY**SOP No:** HR-037-22**Department:**

Human Resources

this Policy and related practices and procedures are consistent with the following principles as prescribed in the Customer Service Standard:

- a) The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.
- b) The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.
- c) Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services, or facilities.
- d) When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.

5.2 **Assistive Devices:** A person with a disability may provide their own assistive device for obtaining, using, and benefiting from Skyline's goods and services unless otherwise prohibited by law (i.e.: health and safety reasons). In such situations, Skyline may offer a person with a disability other reasonable measures to assist them in obtaining, using and benefiting from Skyline's goods and services, where Skyline has such other measures available. Skyline will provide training and information to all employees on various assistive devices that are available at the residential complex for customers.

5.3 **Service Animals:** Skyline is committed to welcoming people with disabilities who are accompanied by a service animal on the parts of the premises that are open to the public and other third parties except where prohibited by law. If a guide dog or other service animal accompanies a visiting person with a disability, Skyline shall ensure that the person is permitted to enter the premises with the animal and keep the animal with him or her at all times. When an animal cannot be easily identified as a service animal, a Skyline employee may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

5.4 **Support Persons:** Skyline is committed to welcoming people with disabilities who are accompanied by a support person. If a support person accompanies a visiting person with a disability, Skyline shall ensure that both persons are entitled to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

5.5 **Notice of Temporary Disruptions Policy:** Temporary disruptions in the Skyline's services and facilities may occur due to reasons that may or may not be within Skyline's control or knowledge. Skyline will make reasonable efforts to provide prior notice of planned disruptions if possible, recognizing that in some circumstances such as in the situation of unplanned temporary disruptions, advance notice will not be possible.

- a) Skyline will make reasonable efforts to provide notice of the disruption to the public, by posting a notice in a visible place which includes the following:

ACCESSIBLE CUSTOMER SERVICE POLICY**SOP No:** HR-037-22**Department:**

Human Resources

- information about the reason for the disruption;
- its anticipated duration; and
- a description of alternative facilities or services, if any, that may be available.

b) Notice will be provided by a variety of methods, depending on the circumstances, and may include postings in conspicuous places at the residential complex, in other facilities of the residential complex, on Skyline's website or by any other means that will reasonably ensure that the notice reaches those persons potentially affected by the temporary disruption in a manner that is accessible to them.

5.6 **Staff Training:** Skyline will deliver training to all its employees and others who deal with the public on its behalf, and all those who are involved in the development and approval of customer service policies, practices and procedures including managers, supervisors, etc. In addition, staff will participate in further training specific to the customer service policies, procedures and practices of Skyline. This training will be required for all new employees within three (3) months of employment. Refresher training and updating of knowledge will be required for all staff every year or when legislative and company updates are made to these policies, practices, and procedures.

Training will include the following:

- a) An overview of the purposes and principles of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility and Customer Service Standard;
- b) Training on how to interact and communicate with people with various types of disabilities;
- c) Training on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- d) Training on how to use equipment or assistive devices available at the residential complex or otherwise provided by Skyline that may help with the provision of goods or services to a person with a disability;
- e) Training on what to do if a person with a disability is having difficulty in accessing Skyline's goods and services
- f) Training on the current policies, practices and procedures relating to the Customer Service Standard.
- g) Skyline will keep records of the training provided, including the dates on which training was received, and the names and number of participants.

5.7 **Feedback Process:** Feedback about the delivery of goods and services to persons with disabilities, and on the feedback process itself, may be given by contacting the respective Property Manager, on-site staff, or by telephoning Skyline Customer Service or Skyline Human Resources (if feedback is related to employment) at 1-519-826-0439, or toll-free at 1-855-608-0439, in person, in writing, or by e-mail. (CustomerService@skylineonline.ca). All feedback will be kept in strict confidence and will be used to improve customer service.

ACCESSIBLE CUSTOMER SERVICE POLICY**SOP No:** HR-037-22**Department:** Human Resources

- a) If the feedback raises serious concerns with respect to the delivery of goods and services to persons with disabilities, Skyline will provide a response to the concerns in a timely manner. If necessary, Skyline will take action to resolve the concerns, and will make procedural adjustments where required.

5.8 **Document Format & Availability:** This Policy and any corresponding practices and procedures, including educational or training resources and materials and training records, will be made available to any person on request. Skyline shall post notice of the availability of these documents in a conspicuous place at the residential complex and, if applicable, on Skyline's website. Documents may be requested by telephone (1-519-826-0439 or toll-free at 1-855-608-0439), in person, in writing, or by e-mail (HR@skylinegrp.ca).

- a) Upon request, Skyline shall provide this Policy and other any forms or records created pursuant to the Customer Service Standard in a format that take into account the disability of the person submitting the request.

6.0 DEFINITIONS:

6.1 **Disability:** - For the purposes of this policy 'disability' is defined per the Accessibility for Ontarians with Disabilities Act 2005 as:

- 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, 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
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the 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*; ("handicap")

6.2 **Service Animal:** An animal is a service animal for a person with a disability,

- a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or;
- b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability (O. Reg 165/16, s. 4 (a/b): O. Reg. 165/16 s. 80.45(4))

6.3 **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 or medical needs or with access to goods or services or facilities O. Reg. 165/16, s. 80.45 (3)

6.4 **Assistive Device:** An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities, such as

ACCESSIBLE CUSTOMER SERVICE POLICY**SOP No:** HR-037-22**Department:** Human Resources

moving, communicating or lifting. Personal assistive devices can include things like wheelchairs, hearing aids, white canes or speech amplification devices.

7.0 REFERENCES:

- 7.1 *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 (the “AODA”) and Ontario Regulation 165/16 (the “Customer Service Standard”) and all other provincial variations within Canada.*
- 7.2 *Residential Tenancies Act, S.O. 2006, c.17 (the “R.T.A.”) and all other provincial variations within Canada.*
- 7.3 *Human Rights Code, R.S.O. 1990, c. H.19 (the “Code”) and all other provincial variations within Canada.*
- 7.4 *Training Resource for Small Businesses and Organizations. (n.d.). Retrieved July 13, 2017, from <http://www.aoda.ca/training-resource/>*
- 7.5 *Skyline Human Rights Policy, HR-038-XX*
- 7.6 *Skyline Accommodation Policy, HR-096-XX*



ACCESSIBLE CUSTOMER SERVICE POLICY

SOP No: HR-037-22

Department: Human Resources

HISTORICAL CHANGES:

Date	Section	Changes made	Author of Change
Nov 22, 2011	All	Created Document	D. Kiar
May 24, 2012	5.6	Updated to include dates when training would be completed to ensure compliance with AODA	D. Kiar
Jan 30, 2013	All	Updated to new SOP format; new approver	D. Kiar
Nov 30, 2014	Header/Footer	Updated to new SOP format; added reference to internal policy.	D. Kiar
June 6, 2017	4.3	Updated to include participation in training as responsibility of employee	F. Yachetti
August 1, 2017	1.1(a)(b), 5.7, 5.8, 6.4	Updated to include reference to employment accommodation; added reference to internal policy; expanded on Feedback Process and Document Availability; added definition of Assistive Device	F. Yachetti; E. Ashton
Nov 29, 2019	All	Reviewed all sections; Updated Procedure and Definitions to reflect new Customer Service Standards under O. Reg 165/16	J. Savage
March 26, 2020	All	Reviewed all sections	E. Ashton
March 12, 2021	All	Reviewed all sections	J. Alessi
June 3, 2022	All	Reviewed all sections, minor verbiage updates.	J Alessi
July 25, 2022	4.3	Updated to include Marketing responsibilities	J. Moniz