

## **Accessible Customer Service Policy**

**Issued: December 14, 2011**

**Effective January 1, 2012**

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### **PURPOSE**

The purpose of this policy is to ensure that people using the Services of TheMIGroup have equal access to our Services. This policy explains some of the things that TheMIGroup is doing to ensure that individuals can use its services without barriers. At the same time, individuals may have other needs that may need to be considered on a case by case basis. This policy sets out the process to let employees know about these situations so that they can work with our customers to ensure our services are accessible to them.

### **COMMITMENT**

TheMIGroup is committed to providing an inclusive and accessible environment in which all customers have equal access to our services and are treated with dignity and respect. Every effort will be made to provide services that accommodate a variety of physical, mental, language and cultural needs, while respecting the privacy and dignity and independence of those being served. TheMIGroup aims to provide its services in accordance with the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*.

### **COVERAGE**

- 1) This policy applies to all employees of TheMIGroup.
- 2) This policy applies to any volunteer, temporary employee/contractor, Providers, Agents and/or Contractors who deal with the public or other third parties that act on behalf of TheMIGroup, including when the provision of goods and services occurs off the premises of TheMIGroup.

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

#### **Scope:**

- a) This policy applies to the provision of good and services at premises owned and operated by TheMIGroup.
- b) The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by TheMIGroup.

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- c) This policy shall also apply to all persons who participate in the development of TheMIGroup's policies, practices and procedures, governing the provision of goods and services to members of the public or third parties.

TheMIGroup 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 way, 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 services; and
- communicating in a manner that takes into account the customer's disability.

### **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 or 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.

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### **ACCOMODATING A PERSON WITH DISABILITY**

All requests for “accommodation” will be met unless it creates extreme costs or health and safety risks.

Accommodation means making sure the customer received the full benefit of our services by providing them with service in a way that makes sense to them, depending on their physical, mental, emotional and linguistic needs.

TheMIGroup wants to ensure that our services are as barrier free as possible. All persons needing access to our services and locations will be free to use assistive devices (such as canes, wheelchairs) and service animals (such as guide dogs). This is reviewed later in the policy.

Customers who need to request accommodation ahead of their access to services or meeting with a staff member, can contact the VP of Client Services & Administration at the specific location, or they can mail in their request to that location address or by email. The Customer needs to clearly indicate that it is “**a request for accommodation.**” (See Appendix 2 of this document, for information provided to customers on the types of accommodation they can request).

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### **EXAMPLES OF ACCOMMODATION:**

If a customer needs to bring a support person with them in order to access services, they do not have to tell us why the support person needs to be with them, just that “I need this person with me”.

If the customer has limited vision, or has a disability that makes it difficult for them to understand printed material, we can give them documents in large print, or an audio version of the document, or they can have the materials explained to them, or the format that works best for them.

If the customer has limited hearing, or a disability that makes it difficult for them to understand speech, we can provide them with the information in writing, in the format that works best for them or they can bring a support person with them to the meeting. The customer can also ask the staff person to speak slowly or to write down/email some key points for them to take away or print later.

The customer doesn't have to give details of their disability when they ask for accommodation, just the way in which they need to be accommodated. Each persons needs are individual. Customers should be encouraged to let staff know what they need to serve them better.

### **Assistive Devices**

#### **Customer's own assistive device(s):**

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by TheMIGroup.

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, Service Animals and Service Dogs:**

A customer with a disability that is accompanied by a guide dog, service animal or service dog, will be allowed access to premises that are open to the public unless otherwise excluded by law.

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### Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law, TheMIGroup will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

### Care and Control of the Animal:

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

### Support Persons:

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

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

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### **NOTICE OF DISRUPTIONS IN SERVICE**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of TheMIGroup. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use TheMIGroup's services, 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.

#### **Notifications will include:**

In the event that a notification needs to be posted TheMIGroup will ensure the following information will be included unless it is not readily available or known:

- services that are disrupted or unavailable;
- reason for the disruption;
- anticipated duration;
- a description of alternative services or options.

#### **Notifications Options:**

When disruptions occur TheMIGroup will provide notice by:

- posting notices at the main entrance and the nearest accessible entrance to the service disruption;
- verbally notifying customers when they are making a reservation or appointment; or
- any other method that may be reasonable under the circumstances.

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### **TRAINING**

Training will be provided to:

- a) All employees, volunteers, temporary employees/contractors who deal with the public or other third parties that act on behalf of TheMIGroup.
- b) All Third Party Providers and Agents who deliver Goods/Services in Ontario on behalf of TheMIGroup are required to comply with this legislation. Existing Providers and Agents with 20 or more employees will also be asked to acknowledge their understanding of the legislation and agree to abide by its provisions. New Providers and Agents will be asked to do the same as part of the selection or RFP Process.
- c) Those who are involved in the development and approval of customer service policies, practices and procedures.

### **Training Provisions:**

Training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions as applicable on how to interact with people with disabilities who:
  - use assistive devices;
  - require the assistance of a guide dog, service dog or other service animal; or
  - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- TheMIGroup's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

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### Training Schedule:

Training will be provided to new employees, volunteers, temporary employees/contractor who deal with the public or act on our behalf during new through a variety of methods, including but limited to; new hire orientation, team meetings and Management Talks for current employees. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

### Record of Training:

TheMIGroup will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

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### **FEEDBACK PROCESS**

TheMIGroup will provide customers with disabilities the opportunity to provide feedback on the service provided to them. Information about the feedback process will be made available to all customers. Notice of the process will be made available at the front desk Reception areas at MI locations. Feedback forms along with alternate methods of providing feedback such as verbally, (for example in person or by telephone) or written (for example, hand written and delivered in person, or via email) will be available upon request.

#### **Submitting Feedback:**

Customers can submit feedback or ask any questions regarding the Policy by email, phone or fax to:

- Human Resources,
- TheMIGroup, Corporate Office
- 6745 Financial Drive, Mississauga, ON, 1905 812 8900, or Toll free at 1888 677 4650.
- Fax number 1905 814 6702
- [hr@themigroup.com](mailto:hr@themigroup.com)

Customers who wish to provide feedback, or who have a query, can do so sending the details in an email, to our general delivery mail box at [www.themigroup.com](http://www.themigroup.com) or to [hr@themigroup.com](mailto:hr@themigroup.com)

Customers that provide formal feedback will receive acknowledgement of their feedback and after further investigation if necessary, any resulting action taken by TheMIGroup, based on concerns or complaints that were submitted.

### **NOTICE OF AVAILABILITY AND FORMAT OF DOCUMENTS**

Upon request, TheMIGroup will notify customers, that the Policy related to the *Accessibility Standard for Customer Service* is available and can be provided in a format that takes into account the customer's disability.

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### **COMPLIANCE**

TheMIGroup has established a Compliance team who will:

- Be part of the process to review our processes, policies and procedures with regards to accommodating persons with disabilities.
- Review the feedback that is provided by those persons with disabilities that access our Services and make recommendations for responding to those queries

### **FOLLOW-UP**

If you have any questions or concerns about this policy or its related procedures please contact:

- Carmen Allen, Manager, Employee Relations & Recruitment Services
- 1905 812 8900
- 6745 Financial Drive, Mississauga, ON, L5N 7J7
- carmen.allen@themigroup.com

This policy and its related procedures will be reviewed as required in the event of legislative changes.

**Employee/Contractor/Volunteer**  
**Acknowledgement & Agreement Form**

I acknowledge that I have read and understand the Accessibility Standards for Customer Service Policy of TheMIGroup. Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may disciplinary action, up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Manager: \_\_\_\_\_

Please return this form to Human Resources, Corporate, Toronto

## **APPENDIX 1**

### **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.

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

Support Person – as reflected 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 goods and services.

*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 pitbulls) 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.

## **APPENDIX 2**

### **TO OUR CUSTOMERS - ACCOMODATION TO MEET YOUR NEEDS:**

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- If you has limited hearing, or a disability that makes it difficult for you to understand speech, we can provide you with the information in writing, in the format that works best for you or you can bring a support person with you to the meeting (you can also ask the staff person to speak slowly or to write down/email some key points for you to take away or print later).
- You do not have to give details of your disability when you ask for accommodation, just the way in which you need to be accommodated. Each persons needs are individual. Please let us know what we need to do to serve you better.
- If you who need to request accommodation ahead of your access to services or meeting with a staff member, you can contact the VP of Client Services & Administration at the specific location you will be visiting by phone or you can mail in your request to that location address or by email. Details of the email address are located on our website at: <http://www.themigroup.com/publicsite/en/Office-Locations-323.aspx>, or at; [mi.toronto@themigroup.com](mailto:mi.toronto@themigroup.com). You need to clearly indicate that it is a request for accommodation.