

Accessibility for Ontarians with Disabilities Customer Service Policy

1. PURPOSE AND SCOPE

The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) is a Provincial act aimed at creating a more accessible Ontario by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with disabilities. A standard for customer service (the Customer Service Standard) has been established under the AODA to ensure that goods and services are, where at all possible, equally accessible to every Ontarian.

This policy deals with the Accessibility Standards for Customer Service Ontario.

2. POLICY STATEMENT

Nelson Education is committed to applying the principles and guidelines of the AODA and strives to provide goods and services in a way that respects the dignity and independence of persons with disabilities. Nelson Education will use reasonable efforts to ensure its policies, practices and procedures are consistent with the spirit and requirements of the Customer Service Standard.

It is the policy of Nelson Education that every employee and customer has a right to equitable treatment with respect to employment, services, goods, facilities, accommodation and membership in vocational associations without discrimination in accordance with the provisions of the Ontario *Human Rights Code*.

Nelson Education strives to provide a barrier-free environment for its customers. Goods and services will be provided in a manner that is based upon the principles of dignity, independence, integration and equal opportunity to all of its customers. The provision of goods and services to customers with disabilities will be integrated wherever possible. We will endeavour to ensure that customers with disabilities receive the same high standard of service that we strive to provide to all customers.

3. DEFINITIONS

Accessible shall mean capable of being entered or reached, approachable; easy to get at; capable of being influenced, obtainable; able to be understood or appreciated.

Assistive Device shall mean a device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Customer Service Standard.

Barrier shall mean anything that prevents a person with a disability from fully participating in all aspects of society, including the workplace, because of his or her disability including:

- A physical barrier
- An architectural barrier

- An information or communications barrier
- An attitudinal barrier
- A technological barrier
- A policy or practice

Customers shall mean those who receive goods and services.

Dignity shall mean respecting and treating every person including persons with a disability as valued and as deserving of effective and full service as any other customer.

Disability shall mean:

- 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 a 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*.

Goods and Services shall mean goods and services provided by Nelson Education.

Independence shall mean freedom from control or influence of others, freedom to make your own choices.

Service Animal shall mean an animal that has been trained to perform tasks that assist people with disabilities and includes any animal,

- 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.

Support Person shall mean an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services.

4. PROVIDING GOODS AND SERVICES TO CUSTOMERS WITH DISABILITIES

Nelson Education is committed to excellence in serving all customers including those with disabilities and will carry out its functions and responsibilities to ensure that policies, practices and procedures are consistent with the following principles:

- (a) Nelson Education's goods and services are provided in a manner that respects the dignity and independence of customers with disabilities;
- (b) The provision of Nelson Education's goods and services to customers with disabilities is integrated with those provided to customers who do not have disabilities unless an alternative measure is necessary to enable a customer with a disability to obtain, use or benefit from Nelson Education's goods or services;
- (c) Customers with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from Nelson Education's goods and services; and
- (d) To ensure the best possible customer service, Nelson Education encourages open two-way communication and expects customers with disabilities to communicate their needs for accommodation or assistance if it is not readily apparent how that need can be met.

4.1 COMMUNICATION

Nelson Education strives to communicate with customers with disabilities in ways that take into consideration their disabilities and their preferred method of communication.

- (a) Customers with disabilities will be offered alternative communication formats that will meet the needs of the customer as promptly as feasible;
- (b) Documents will be provided to customers in an alternative format that will meet the needs of the customer in a timely fashion; and
- (c) If telephone communication is not suitable for the customer's needs, alternative forms of communication will be offered as required.

4.2 USE OF SERVICE ANIMALS, ASSISTIVE DEVICES, AND SUPPORT PERSONS

Nelson Education will strive to ensure that the access, use and benefit of goods or services are not compromised for customers with disabilities who require assistive devices, or who are accompanied by a service animal or support person.

4.2.1 SERVICE ANIMALS

Service animals accompanying a customer with disabilities shall be permitted entry to all Nelson Education's facilities and meeting rooms that are open to the public or other third parties, unless the service animal is otherwise excluded by law.

If it is not readily apparent that the animal is a service animal, Nelson Education may ask the customer with a disability to provide a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the customer's

disability. It is the responsibility of the customer using the service animal to ensure that the service animal is kept in control at all times.

Nelson Education's employees will receive training on how to interact with customers with disabilities who are accompanied by a service animal.

In the rare case where Nelson Education cannot permit a service animal access to a facility or meeting room, other accommodations may be provided to the customer such as: alternate meeting format, e.g., teleconference where technology permits; delivery of goods or service at an alternate time or location; other assistive measures available to deliver a good or service to ensure equality of outcome.

4.2.2 ASSISTIVE DEVICES

Customers with disabilities are permitted, where possible, to use their own assistive devices when on Nelson Education's premises for the purposes of obtaining, using or benefiting from our goods or services. Exceptions may occur in situations where Nelson Education has determined that the assistive device may pose a risk to the health and safety of another person with a disability or the health and safety of others on our premises.

If there is a physical, technological or other type of barrier that prevents the use of an assistive device on our premises, we will first endeavour to remove that barrier. If we are not able to remove the barrier, we will ask the customer how he/she can be accommodated and what alternative methods of service would be more accessible to him/her. We will make best efforts to provide an alternative means of accessibility to the customer.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

Nelson Education will ensure that staff receive training on various assistive devices that may be used by customers with a disability while accessing our goods and services.

4.2.3 SUPPORT PERSONS

Nelson Education is committed to welcoming customers with disabilities who are accompanied by a support person. Any customer with a disability who is accompanied by a support person will be allowed to enter Nelson Education's premises with his or her support person. At no time will a customer with a disability who is accompanied by a support person be prevented from having access to his or her support person while on the Nelson Education premises.

Where appropriate, support persons may be required to acknowledge that it is the customer, and not the support person, to whom Nelson Education is providing its goods and/or services.

Conferences Held or Sponsored by Nelson Education

Nelson Education occasionally holds conferences, events and workshops sponsored by Nelson Education or by third parties. For such events, support persons shall be permitted entry to all Nelson Education facilities and meeting rooms that are open to the public, except: when there are fees applied against participants by a third party and the support person was not pre-registered and/or no vacancy exists. If admission to an event is permitted and fees are payable to a third party, the support person is permitted to attend the event at their own cost. Cost for services (e.g., food, lodging, etc.) will be the responsibility of the customer or his or her support person.

If admission to an event is permitted and fees are payable to Nelson Education, the support person is permitted to attend at no cost for admission. Cost for other services (e.g., food, lodging, etc.) will be the responsibility of the customer or his or her support person.

When a Support Person May Be Required

If a support person is necessary for the health and safety of a person with disabilities, or for the health and safety of other persons, Nelson Education will require the accompaniment of a support person on Nelson Education premises.

Where a Nelson Education employee believes that a support person should be in attendance to protect the health and safety of the customer with disabilities or others, the following criteria shall be used in consulting with the customer:

- whether there is a significant risk to the health and safety of the customer with a disability or to others (the mere possibility of risk is insufficient);
- whether the risk cannot be eliminated or reduced by other means;
- whether the assessment of the risk is based on consideration of the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm; and
- whether the assessment of the risk is based on the customer's actual characteristics, not merely on generalizations, misperceptions, ignorance or fears about a disability.

A customer with a disability is required to provide his or her own support person. A customer who requires the assistance of a support person is also expected to inform Nelson Education that he or she will be attending with a support person.

4.3 TEMPORARY DISRUPTION TO FACILITIES OR SERVICES

In the event that a temporary service disruption occurs that would limit a customer with a disability from gaining access to Nelson Education facilities, goods or services, Nelson Education will make the disruption known to customers in the following ways:

- (a) Nelson Education will post notice of the service disruption on premises in the area where the service disruption has occurred;
- (b) Nelson Education may notify customers of the service disruption by means of recorded message, posting on the Nelson Education website or other reasonable means in the circumstances.

In the event of an unexpected service disruption, notice will be provided as soon as possible. Notices will include information about the nature of the disruption, the reason for the disruption, its anticipated duration, alternative service locations if applicable, and a description of alternative facilities or services if available from the affected service department.

5. TRAINING AND RECORDS

Nelson Education will provide training as required under the AODA to all of Nelson Education's staff to whom this policy applies as well as to those persons charged with developing this policy and related procedures and practices.

Training will include:

- A review of the purposes of the AODA and requirements of the Customer Service Standard;
- Instruction on how to interact and communicate with customers who have various types of disabilities;
- Instruction on the use of available technology and assistive devices, and on interaction with service animals and support persons;
- Instruction on how to use equipment and devices made available on our premises to assist customers with disabilities to obtain, use or benefit from our goods and services;
- Instruction on what to do if a person with disabilities is having difficulty accessing services;
- Instruction on the content and requirements of Nelson Education's policies, practices and procedures relating to the Customer Service Standard.

Updated training will be provided as policies, practices and procedures change.

Records of training provided to staff, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance with the requirements of the AODA.

6. NOTICE OF AVAILABILITY OF POLICY AND PROCEDURES

Nelson Education's AODA Customer Service Policy will be made available to the public and customers upon request.

Notification of the availability of AODA policies and procedures will be posted on Nelson Education's website. Nelson Education will provide documents, or the information contained in the documents, required to be provided under the Customer Service Standard to a customer with a disability in a format that takes into account the customer's disability.

7. FEEDBACK PROCESS

The goal of Nelson Education is to meet the needs of our customers while paying attention to the unique requirements of our customers with disabilities. Comments on our services regarding how well those expectations are being met are welcomed and appreciated.

Feedback regarding the way Nelson Education provides goods and services to people with disabilities can be made in person, by telephone 416-288-2797, or through email at nelson.accessibility@nelson.com.

Feedback will be collected by People and Engagement and will be responded to in a timely and accessible manner. Where appropriate, feedback will be taken into consideration as part of the ongoing review of the AODA Customer Service Standard policies and procedures.