



Policy – ACCESSIBLE CUSTOMER SERVICES POLICY	Version 7.0
	<i>Created: December 2011 Latest Revision: December 2011</i>

PURPOSE:

Lakeland Power Distribution Ltd (hereafter known as the “LDC”) is committed to providing exceptional and accessible service for its customers in a way that respects the dignity, independence, integration and equality for all people. The provision of services to persons with disabilities will be integrated wherever possible. Persons with disabilities, including those that use or need the use of assistive devices and/or support persons, will be given an opportunity, equal to that given to others, allowing them to benefit from the same services, in the same place and in a similar way as other customers.

POLICY STATEMENT (LEGISLATION):

Ontario Regulation 429/07 made under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), came into force on January 1, 2008. This Regulation entitled, “Accessibility Standards for Customer Service” established accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods or services to members of the public.

This policy is prepared in accordance with the Regulation and addresses the following:

- The provision of goods and services to persons with disabilities
- The use of assistive devices, service animals and/or support persons by persons with disabilities
- Notice of temporary disruptions in services and facilities
- Customer service training
- Customer feedback regarding the provision of goods and services to persons with disabilities
- Best practices and procedures for Customer Service

SCOPE:

This policy applies to all persons who deal with members of the public on behalf of the LDC, whether the person does so as an employee, contractor, third-party, student on placement or otherwise.

PRINCIPLES AND IMPLEMENTATION:

The LDC will provide goods and services to people with disabilities, with particular consideration to the following areas:



The Provision of Goods and Services to Persons with Disabilities:

The LDC will use reasonable efforts, where possible, to ensure its policies, practices and procedures are consistent with the following principles:

- Goods and Services are provided in a manner that respects the dignity and independence of persons with disabilities;
- The provision of goods and services to persons with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person with a disability to obtain, use or benefit from the LDC's goods and services; and
- Persons with disabilities to obtain, use, or benefit from the LDC's goods and services.

Communication:

When communicating to a person with a disability, the LDC will do so in a manner that takes into account the person's current barriers. Staff will be trained on how to interact and communicate with people with various types of disabilities.

Assistive Devices and other Measures that Assist with Accessibility:

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from the LDC's goods and services. Exceptions may occur in situations where it has been determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises.

In these situations and others, the LDC may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from the LDC's goods and services, where such other measures are available.

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

Service Animals:

Persons with a disability may enter premises owned and operated, or operated, by the LDC accompanied by a service animal and keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, the LDC will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from the LDC's goods and services.

If it is not readily apparent that the animal is a service animal, the LDC may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability. The LDC may also, or instead, ask for 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.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

Support Persons:

A person with a disability may enter premises owned and operated, or operated, by the LDC with a support person and have access to the support person while on the premises.

The LDC may require a person with a disability to be accompanied by a support person while on the LDC's premises in situations where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

A support person, when assisting a person with a disability to obtain, use or benefit from the LDC's goods and services, will be permitted to attend at no charge where an admission fee is applicable.

Training:

The LDC shall require that the following people receive training about the provision of its goods or services to people with disabilities:

- Every person who deals with members of the public or other third parties on behalf of the LDC, whether the person does so as an employee, agent, volunteer or otherwise.
- Every person who participates in developing the LDC's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties.

The LDC shall provide training to its employees and will maintain records which will record the details of the training provided, as well as the name of the person, location, and date the training was completed.

The LDC will provide training to each person as soon as practicable after he or she is assigned the applicable duties. Training will also be provided on an ongoing basis in connection with changes to applicable legislation, and/or the LDC's policies, procedures and practices governing the provision of goods or services to person with disabilities.

Third party contractors who deal with the public or other third parties on behalf of the LDC's shall ensure that their employees, agents, subcontractors, etc. receive training in accordance with this policy and the Accessible Standards for Customer Service, Ontario Regulation 429/07 and upon request provide the training records to the LDC.



Accessibility Awareness Training will include the following elements:

- i. A review of the purposes of the AODA and the requirements of the Customer Service Standard;
- ii. How to provide goods and services in a manner that respects the dignity and independence of persons with disabilities;
- iii. How to interact and communicate with persons in a manner that takes into account their disabilities;
- iv. How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- v. The process for people to provide feedback about the LDC's provision of goods and services to persons with disabilities;
- vi. What to do if a person with a disability is having difficulty accessing the LDC's goods or services.

Notice of Temporary or Unexpected Disruptions in Service:

In the event of a temporary or unexpected disruption of services, the LDC will make a reasonable effort to provide notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration.

Notice of the disruption may be provided to the radio station, Customer Service Representatives, on-call answering service, telephone voice message, and whenever possible by posting it on the LDC's website.

Feedback Process:

Feedback from the public is encouraged as it may identify areas that may require change and service improvement.

The public and/or employees may provide feedback to the LDC on the delivery of goods and services to persons with disabilities:

By Mail/In Person: Lakeland Power
200-395 Centre St N
Huntsville, ON P1H 2M2

By Telephone: 705-789-5442 or 1-888-282-7711

By email: service@lakelandpower.on.ca



BEST PRACTICES AND PROCEDURES FOR CUSTOMER SERVICE:

Inclusive vs. Exclusive/Incorrect Language

Instead Of	Use
<i>the visually impaired/blind</i>	person who is blind, person who has a visual impairment
<i>the aged/elderly</i>	Seniors
<i>disabled, handicapped, crippled</i>	person with a disability, people with disabilities
<i>lame</i>	person who has a mobility impairment
<i>physically challenged</i>	person with a physical disability
<i>deaf, mute, dumb, hearing impaired</i>	person who is deaf...hard of hearing
<i>confined to a wheelchair, wheelchair bound</i>	person who uses a wheelchair
<i>insane, crazy, demented, deviant, loony, lunatic, mad, maniac, mental, mentally diseased, neurotic, nut case, psycho, schizophrenic, mentally retarded, defective, feeble minded, idiot, imbecile, moron, simple, mongoloid</i>	person with a mental health disability, person who has schizophrenia, person who has depression, person with an intellectual disability, person who is intellectually impaired
<i>suffers from, afflicted by, stricken with, victim of</i>	person with a disability or mobility impairment, person who has multiple sclerosis, etc.

Physical Disabilities

Physical disabilities include a range of functional limitations from minor difficulties in moving or coordinating one part of the body, through muscle weakness, tremors, and paralysis. Physical disabilities can be congenital such as Muscular Dystrophy; or acquired, such as tendonitis. A physical disability may affect an individual's ability to:

- Perform manual tasks such as holding a pen, turning a key or grip a door knob
- Move around independently
- Control the speed or coordination of movements
- Reach, pull, or manipulate objects
- Have strength or endurance

Best Practices and Procedures for Customer Service

There are many types and degrees of physical disabilities and not all require a wheelchair. It may be difficult to identify a person with a physical disability. The following procedures are to be followed in this situation:

- Provide seating for those who cannot stand in line
- People with physical disabilities often have their own way of doing things, so ask first before you help
- Be patient as customers will identify their needs to you
- Speak normally, and directly to your customer, Do not speak to the support person accompanying them



Tips:

- Wheelchairs and other mobility devices are part of a person’s personal space, do not touch, move or lean on them
- Provide your customer information about accessible features of the immediate environment (automatic doors, washrooms, etc.)
- Keep ramps and corridors free of clutter
- If a surface is too high or wide, step around it to provide service

Hearing Disabilities

Hearing loss or disabilities may cause problems in distinguishing certain frequencies, sounds, or words. A person who is deaf, deafened, or hard-of-hearing may be unable to:

- Use a public telephone
- Understand speech in a noisy environment
- Pronounce words clearly enough to be understood by strangers

Best Practices and Procedures for Customer Service

The following procedures are to be followed in this situation:

- Always ask how you can help. Do not shout. Speak clearly
- Any personal matters should be discussed in a private room to avoid other people overhearing
- Deaf people may use a sign language interpreter to communicate. Always direct your attention to the Deaf Person, not the interpreter
- If they have a service animal, do not touch it, the service animal is working and has to pay attention at all times

Tips

- Attract the customer’s attention before speaking. The best way is a gentle touch on the shoulder or gently waiving your hand.
- Be clear and precise when giving instructions and be prepared to repeat or rephrase if necessary.
- Face the person directly and keep all objects away from your face and mouth.
- If the person uses a hearing aid, try to speak in an area with few competing sounds.
- If required, write notes back and forth to share information

Deaf-Blindness Disabilities

Deaf-blindness is a combination of hearing and vision loss. The result for a person who is deaf-blind has significant difficulty assessing information and performing daily activities. Deaf-blindness interferes with communication, learning, orientation, and mobility. People who are deaf-blind communicate using various sign language systems, Braille, telephone devices, communication boards and any combination thereof. Many people who are deaf-blind use the services of an Intervener/Personal Support Person who relays information and facilitates auditory and visual information and act as a sighted guide.



Best Practices and Procedures for Customer Service

Most people who are deaf-blind will be accompanied by an Intervener, Personal Support Person or professional who helps with communicating. Interveners are trained in special sign language that involves touching the hands of the client in a two-hand, manual alphabet or finger spelling, and may guide an interpreter for their client. The following procedures are to be followed in this situation:

- A customer who is deaf-blind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them.
- Do not touch or address the service animals, they are working and have to pay attention at all times.
- Direct your attention to your customer, not the Intervener.

Tips

- Do not assume what a person can or cannot do. Some people who are deaf-blind have some sight or hearing, while others have neither.
- Never touch a person who is deaf-blind suddenly or without permission unless it's an emergency.
- Understand that communication can take some time, be patient.

Vision Disabilities

Vision disabilities reduce one's ability to see clearly. Very few people are totally blind. Many have limited vision such as tunnel vision, where a person has a loss of peripheral or side vision, or lack of central vision, which means they cannot see straight ahead. Some can see the outline of objects while others can see the direction of light. Vision loss may result in:

- Difficulty reading or seeing faces
- Difficulty maneuvering in unfamiliar places
- Inability to differentiate colours or distances
- A narrow field of vision
- The need for bright light or contrast
- Night blindness

Best Practices and Procedures for Customer Service

Vision disabilities may restrict your customers' abilities to read signs, locate landmarks, or see hazards. In some cases, it may be difficult to tell if a person has a vision disability. Others may use a service animal or white cane. The following procedures are to be followed in this situation:

- Verbally identify yourself before making physical contact
- If the person uses a service animal, do not touch or approach the animal, it is working.
- Verbally describe the setting, form, location as necessary.



- Offer your arm to guide the person. Do not grab or pull. Direct the person from the elbow.
- Never touch your customer without asking permission, unless it is an emergency.
- Do not leave your customer in the middle of a room. Show them to a chair, or guide them to a comfortable location.
- Do not walk away without saying good-bye.

Tips:

- When you know someone has vision loss, don't assume the individual can't see you. Many people who have low vision still have some sight.
- Identify yourself when you approach and speak directly to the Customer.
- Ask if they would like you to read any printed material out loud to them (for example, a menu or schedule of fees).
- When providing directions or instructions, be precise and descriptive.
- Offer your elbow to guide them if needed.

Intellectual Disabilities

Intellectual disabilities affect a person's ability to think and reason. It may be caused by genetic factors such as Down syndrome, exposure to environmental toxins, such as Fetal Alcohol Syndrome, brain trauma or psychiatric disorders. A person with an intellectual disorder may have difficulty with:

- Understanding spoken and written information
- Conceptual information
- Perception of sensory information
- Memory

Best Practices and Procedures for Customer Service

People with intellectual or developmental disabilities may have difficulty doing many things most of us take for granted. These disabilities can mildly or profoundly limit one's ability to learn. You may not be able to know that someone has this disability unless you are told, or you notice the way people act, ask questions, or use body language.

As much as possible, treat your customers with an intellectual or developmental disability like anyone else. They may understand more than you think, and they will appreciate you treating them with respect. The following procedures are to be followed in this situation:

- Use clear, simple language
- Provide one piece of information at a time
- Speak directly to you customer, not to their support person
- Be patient and verify your understanding (seek confirmation)

Tips

- Do not assume what a person can or cannot do
- Be prepared to explain and provide examples regarding information



- Remember that the person is an adult and unless you are informed otherwise, can make their own decision
- If you cannot understand what is being said to not pretend. Ask again.

Speech Disabilities

Speech disabilities involve the partial or total loss of the ability to speak. Typical disabilities include problems with:

- Pronunciation
- Pitch and loudness
- Hoarseness or breathlessness
- Stuttering or slurring

Best Practices and Procedures for Customer Service

Some people have problems communicating. It could be the result of cerebral palsy, hearing loss, or another condition that make it difficult to pronounce words, causes slurring or stuttering, or not being able to express oneself or understand written or spoken language. Some people who have severe difficulties may use communication boards or other assistive devices. The following procedures are to be followed in this situation:

- Give the person your full attention. Do not interrupt until they finish their sentence
- Ask them to repeat as necessary or to write their message
- Verify your understanding (seek confirmation)

Tips

- If possible, communicate in a quiet environment
- Patience, respect and willingness to find a way to communicate are the best tools

Learning Disabilities

Learning disabilities include a range of disorders that effect verbal and non-verbal information acquisitions, retention, understanding and processing. People with a learning disability have average or above-average intelligence, but take in and process information and express knowledge in different ways. Learning disabilities can result in:

- Difficulties in reading
- Problem solving
- Time management
- Way finding
- Processing information

Best Practices and Procedures for Customer Service

The following procedures are to be followed in this situation:

- Ask how you may assist them
- Offer an alternative form of communication if required



- Break up the information (no lengthy conversations)

Tips

- Learning disabilities are generally invisible and the ability to function varies greatly. Respond to any request for verbal information, assistance in filling in forms and so on, with courtesy.
- Allow extra time to complete tasks as necessary.
- Be willing to provide the information “to go” so they may review it at home
- Use straightforward language if at all possible.

Mental Health Disabilities

Mental Health disabilities include a range of disorders; however, there are three main health disabilities:

- Anxiety
- Mood
- Behavioural

Best Practices and Procedures for Customer Service

The following procedures are to be followed in this situation:

- Ask how you may assist them
- Offer an alternative form of communication if required
- Break up the information (no lengthy conversations)
- Treat each person as an individual. Ask what would make him/her the most comfortable and respect his/her needs to the maximum extent possible
- Try to reduce stress and anxiety in situations

Tips

- Stay calm and courteous, even if the customer exhibits unusual behaviour. Focus on the service they need and how you can help.

Service Animal or Support Person

Service animals offer independence and security to many people with various disabilities. Some laws generally prohibit animals in certain areas (such as food preparation areas); however, service animals are permitted in most public situations.

Support people assist people with disabilities in a variety of ways, by assisting with communication such as an intervener sign language interpreter, or a personal support worker providing physical assistance. A support person may also be a friend or relative that will assist and support the customer.



Best Practices and Procedures for Customer Service

The following procedures are to be followed in this situation:

- Every employee shall use reasonable efforts to allow persons with disabilities to use their own service animal or support person to access goods and services.
- Every employee shall allow persons with disabilities to be accompanied by their guide dog or service animal unless the animal is excluded by law. Where an animal is excluded by law from a premise, the reason why the animal is excluded shall be explained to the person with the disability. Other reasonable arrangements to provide goods and services shall be explored with the assistance of the person with the disability.
- When a service animal is unruly or disruptive (jumping on people, biting, or other harmful behaviour) an employee may ask the person with the disability to remove the animal from the area or refuse access to goods and services. Other reasonable arrangements to provide goods and services shall be explored with the assistance of the person with the disability.
- Persons with disabilities may be accompanied by their support person while accessing goods and services. Speak to the person with the disability not the support person.
- If a support person is necessary to protect the Health & Safety of the person with a disability or the health and safety of others on the premise, the person with a disability may be requested to make arrangements for (and cover the costs) a support person.

Other Disabilities of which to be Aware:

Smell disabilities can involve the inability to sense smells or a hypersensitivity to odours and smells. A person with a smelling disability may have allergies to certain odours, scents, or chemicals or may be unable to identify dangerous gases, smoke, fumes and spoiled food.

Touch disabilities can affect a person's ability to sense texture, temperature, and vibration to pressure. Touch sensation may be reduced or heightened resulting in a hypersensitivity to touch, temperature, or the opposite, numbness and the inability to feel touch sensations.

Taste disabilities can limit the experience of the four primary taste sensations; sweet, bitter, salty and sour. A person with a taste disability may be unable to identify spoiled food or noxious substances.

Other disabilities result from a range of other conditions, accidents, illness and diseases including ALS, asthma, diabetes, cancer, HIV/AIDs, environmental sensitivities, seizure disorders, heart disease, stroke and joint replacement.

It is important to remember that disabilities are not always visible or easy to distinguish.



DEFINITIONS:

Alternative Service means a service generally intended to be temporary that approaches the desired result until such time as the barrier is removed or an equivalent service is put in place.

Assistive Device is a technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities.

Barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability, including a physical barrier, and architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Contractor means a company or person with a formal or informal contract to do a specific job on behalf of the LDC.

Disability is:

- 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.

Service Animal is any animal used by a person with a disability for reasons relating to the disability where 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 registered health care professional confirming that the person requires the animal for reasons relating to the disability.

Support Person is a person who accompanies a person with a disability, in order to assist him or her with communication, mobility, personal care or medical needs or with access to goods or services.