



Accessibility for Ontarians with Disabilities (AODA) Customer Service Policy

A. Overview

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005*, is to make Ontario accessible to people with disabilities by 2025. The Accessibility Standards for Customer Service have been created to ensure that goods and services are accessible to all Ontarians and that persons with disabilities are treated with respect, dignity and equality.

B. Related Policy Statement

The Canadian Red Cross (referred to as “Red Cross”), in keeping with its Mission, Values and Fundamental Principles shall make every effort to ensure that its policies, procedures and practices adhere to the guiding principles established in the *Accessibility Standards for Customer Service: Ontario Regulation 429/07*.

The policy applies to all Red Cross employees, volunteers, or agents in Ontario who deal with the public or other third parties.

The Red Cross is committed to ensuring that persons with disabilities can access our goods and services.

C. Definitions

Agent: any person or organization that provides goods or services on behalf of the Red Cross. This includes but may not be limited to subcontractors.

Disability: refers to:

- i. 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 coordination, blindness or visual impairment, deafness or hearing impairment (inclusive of partial, total or fluctuating hearing loss), muteness or speech impairment, or physical reliance on a dog guide or other animal or sighted guide for persons with visual impairment or total blindness or on a wheelchair or other remedial or assistive device

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- ii. a condition of mental impairment or a developmental disability,
- iii. 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
- iv. 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”)

Dog Guide: means a dog trained as a guide for a person with visual impairment or total blindness and having the qualifications prescribed by the regulations (Blind Persons’ Rights Act 1990 s1 (1))

Service Animal: means an animal acting as a service animal for a person with a disability;

- i. if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- ii. if the person provides a letter from a physician or nurse confirming that the person requires the animal for reason relating to the disability; or
- iii. If the person provides a valid identification card or training certificate from a recognized service animal training school.

Support person: means, in relation to a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care or medical needs or with access to goods or services.

User: An individual who uses a service animal or dog guide; also handler. Red Cross clients who use a service animal may be referred to as “users” or “handlers” in this policy.

D. Procedure Details

1. Communications

- a) When communicating with a person with a disability, Red Cross employees, volunteers and agents will communicate in a manner that takes into account the person’s disability and takes reasonable efforts to ensure that the person with a disability understands the content of its communications.

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- b) Reasonable efforts shall be made to ensure that communication in all formats (e.g., verbal, written or electronic) are presented in a manner that is accessible. Special requests regarding communication formats shall not be unreasonably declined.

2. *Use of Assistive Devices*

- a) The Red Cross supports the use of assistive devices by persons with disabilities to obtain, use or benefit from Red Cross goods and/or services. The Red Cross shall train its employees, volunteers and agents on the use of assistive devices by persons with disabilities.

3. *Use of Service Animals*

- a) Persons with disabilities who are accompanied by a service animal will be permitted to enter Red Cross premises with the animal and keep the animal with them in areas where the public or other third parties are allowed, unless the animal is excluded by law.
- b) Service animals may be prohibited from entering certain areas for Health and Safety reasons or due to law. Ontario Regulation 562 under the Health Protection and Promotion Act states that animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does make an exception for service dogs to allow them to go where food is normally served, sold or offered for sale. Other types of service animals are not included in this exemption.

If the animal is excluded by law, the Red Cross will provide another means of accommodating the person. **PLEASE NOTE:** Some municipalities exclude certain animals from their jurisdictions. Depending on the specifics of the by-law, this may give reason for the Red Cross to exclude certain service animals from its premises.

- c) Identifying Service Animals: Service Animals may be used to describe any animal that assists a person with a disability. They provide a wide range of assistance including but not limited to, guiding a person with a visual impairment or total blindness, alerting a person who has a hearing impairment or who is deaf to certain sounds, opening doors and retrieving items for persons with mobility disabilities, emotional support for persons with mental illness, and many other forms of assistance.

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Service animals may be identified by any one of the following methods:

- i. The animal may be wearing a service animal vest, harness or saddle packs
- ii. The animal may be observed providing assistance
- iii. The person may have a letter from a physician or nurse stating that they require the animal for reasons related to a disability
- iv. The person may show a valid identification card or training certificate from a recognized service animal training school.

Vests worn by dog guides (or service animals) are usually symbolic of the service that they provide to the person with a disability:

- i. Hearing Ear Dogs (HED) wear orange vests
 - ii. Special Skills Dogs (SS) wear blue vests
 - iii. Seizure Response Dogs (SRD) wear yellow vests
 - iv. Autism Assistance Dogs (AAD) wear purple vests
 - v. Seeing Eye Dogs (SED) wear white vests
- b) The Red Cross is aware that service animals are usually well-trained and well-behaved. In the unlikely event that this is not the case, service animals may be removed from Red Cross premises after discussion with the User for any one of the following reasons:
- i. disruptive or aggressive behaviour; such as growling or other signs of threatening or aggressive behaviour. **PLEASE NOTE:** If the dog guide in this case is a Seizure Response Dog – this is an expected response from the animal when assisting the person with a disability.
 - ii. causing damage; including causing damage to any person or property
 - iii. poor health; such as a contagious disease where the animal risks spreading the disease to others
- c) In situations where a person who requires a service animal may be in contact with a person who is allergic to or fearful of animals, the Red Cross will make reasonable attempts to accommodate both persons while respecting their needs.
- d) With regards to the use of Service Animals in relation to Emergency Shelter Management, please reference the Accessible Emergency Shelters Guidance document.

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4. *Use of Support Persons*

- a) A support person may accompany a person with a disability to assist them in a number of ways. A support person may include a friend, family member, volunteer or paid professional 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. Personal care needs may include, but are not limited to, physically transferring an individual from one location to another or assisting an individual with eating or using the washroom. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.
- b) If a person with a disability is accompanied by a support person, the Red Cross shall ensure that both persons are permitted to enter the premises together. A person with a disability accompanied by a support person will not be prevented access to that support person at any time while receiving goods and services from the Red Cross.
- c) All areas accessible to the public and third parties will also be accessible to persons with a disability and their support person(s). For example, washrooms, waiting areas, meeting rooms and offices must be able to accommodate the person with a disability and his/her support person(s).
- d) When addressing a person with a disability who is accompanied by a support person, employees and volunteers will communicate directly with the person with a disability. If confidential/personal information is being exchanged and the person with a disability requests to discuss the information in private, the request will be accommodated and the support person asked to wait in another area.
- e) A support person is required to abide by the same rules and regulations as any other person on the premises. For example, both the person with a disability and his/her support person may both be expected to sign-in a log book when entering a Red Cross premises.
- f) A support person(s) will not be required to pay admission/fees for services provided to a person with a disability unless they are also a recipient of the service. For example, a person with a disability registered in a Red Cross First Aid course can be accompanied by their support person at no additional charge. However, the support person would not receive certification for First Aid training.

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- g) Certain Red Cross programs may require a support person for a person with a disability. This requirement may be based on eligibility criteria. For example, a person with dementia who has a tendency towards aggressive behaviour may require a support person in order to access the Red Cross Transportation program. Consultation will occur with the person with a disability (or substitute decision-maker) regarding the requirements for a support person for these Red Cross programs.
- h) At times, the Red Cross will require a person with a disability to be accompanied by a support person when this is necessary to protect the health and safety of the person with a disability or Red Cross employees and/or volunteers. For example, if a person with a disability presents at a Red Cross operated emergency shelter and requires assistance with personal services beyond that which can be safely provided by Red Cross employees or volunteers, the Red Cross may require that person to be accompanied by a support person.
- i) Dependent upon the program and/or situation, if the person with a disability is unable to contact a known support person, the Red Cross may appoint a trained employee (i.e., Personal Support Worker) or volunteer as a support person for the person with a disability with his/her consent. The Red Cross will consult with local service providers and professionals who may be available to act as a support person for an unaccompanied client with a disability if it has been determined that a support person is necessary for the health and safety of the client, employees, volunteers and other persons on the premises.
- j) With regards to the unique needs of Emergency Shelter Management and the use of Support Persons, please refer to the Accessible Emergency Shelters Guidance document.

5. *Notice of Temporary Disruptions in Services/Branches*

- a) On occasion, some of the services and facilities usually used by persons with disabilities to access the Red Cross' goods and services may not be available due to temporary disruptions. For example, ramps, elevators or accessible washrooms which are not accessible due to routine or unscheduled maintenance. In the event of a temporary disruption, the Red Cross will provide a notice of the goods/services that are

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temporarily unavailable. Notice will be provided within a reasonable timeframe of an unplanned disruption and will be provided in advance where disruptions are planned.

- b) Notices will contain the following information:
 - i) The reason for the disruption;
 - ii) Its expected duration;
 - iii) Alternative facilities or services if they exist.
- c) Notices will be placed in a conspicuous place on the Red Cross premise and in a format that considers the types of disabilities of persons who use the disrupted service. For example, a notice of disruption for an elevator will be placed at a height that would be at the line of vision for an individual using a wheelchair.

6. *Training*

- a) The Red Cross will ensure appropriate levels of training to all employees, volunteers, agents and others who interact with the public on behalf of Red Cross as well as those who are involved in the development and approval of policies, practices and procedures dealing with the provision of goods and services to the public or other third parties. Training will be provided in a manner that is consistent with the requirements of Ontario 429/07. Records of training will be kept that include the dates on which training occurred and the number of persons trained.
- b) Training will include the following topics:
 - i) The purposes of the Accessibility for Ontarians with Disabilities Act, 2005
 - ii) The requirements of the Accessibility Standards for Customer Service
 - iii) How to interact and communicate with people with various types of disabilities
 - iv) How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
 - v) How to use the assistive devices available at Red Cross premises and otherwise made available by the Red Cross for persons with disabilities
 - vi) What to do if a person with a disability is having difficulty in accessing the Red Cross' goods and services
 - vii) The Red Cross' policies, practices and procedures relating to the provision of goods and services to the public and other third parties.

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- c) Training will be provided on an ongoing basis and when changes are made to policies, practices and procedures dealing with the provision of goods and services to the public and other third parties.

7. *Complaint and Feedback Process*

- a) The Red Cross will make information about its feedback and complaints process readily available to the public (i.e., brochures, website). Feedback or complaints about the delivery of goods and services from persons with disabilities may be given in person, by telephone/TTY, in writing, electronically or through other methods.
- b) 100% of accessibility complaints received from persons with disabilities will be recorded and report to the *Ontario Zone Council* for review. Information about the feedback and complaints process and, where applicable, of the progress and outcome of a person's particular situation will be provided to the complainant in an accessible format.
- c) A quarterly report on any accessibility-related complaints will be provided to the Chair(s) of the AODA Committee for informational purposes and to ensure the issue(s) will be addressed within the annual accessibility plan as required.



8. *Accountability*

- a) The AODA Customer Service Policy is the guiding policy for all Red Cross programs. Given the diversity of goods and services offered by the Red Cross, as well as the clientele, each program is expected to develop and implement specific procedures as needed for their own program requirements. For example, the Transportation Program has specific program requirements related to Service Animals.
- b) All Red Cross employees and volunteers shall adhere to this policy. Accountability for requirements outlined in this policy rests with the (TBD – recommend Director, Regional Operations and Program Director).

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E. References

- Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and Ontario Regulation 429/07
- Erie St. Clair Community Care Access Centre, AODA Policies
- Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), Ministry of Community and Social Services.
- Mississauga Halton Community Care Access Centre, AODA Policies
- OCSA: Tips and Tool Kit: Achieving Accessibility in the Home and Community Support Services Sector

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Approved By:	
	Tanya Elliott Vice President, Ontario
	Lorraine Davies Director, People Services
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