

AODA - INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) CUSTOMER SERVICE POLICY 2019

Intent

This policy is intended to meet the requirements of the Customer Service Standards included in the Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

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

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.

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*.

Guide Dog – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – is a service animal for a person with a disability if:

1. 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

2. 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:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario
 - A member of the College of Occupational Therapists of Ontario
 - A member of the College of Optometrists of Ontario;
 - A member of the College of Physicians and Surgeons of Ontario
 - A member of the College of Psychologists of Ontario; or
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Service Dog – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- 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 – 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.

Guidelines

In accordance with the Customer Service Standards, this policy addresses the following:

- A. [The Provision of Goods and Services to Persons with Disabilities](#);
- B. [The Use of Assistive Devices](#)
- C. [The Use of Guide Dogs, Service Animals and Service Dogs](#)
- D. [The Use of Support Persons](#)
- E. [Notice of Service Disruptions](#)
- F. [Customer Feedback](#)
- G. [Training](#)
- H. [Notice of Availability and Format of Required Documents](#)

A. The Provision of Goods and Services to Persons with Disabilities

Parkway 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 ways, 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 goods and services; and
- Communicating in a manner that takes into account the customer's disability.

B. The Use of 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 Parkway.

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, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, 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.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas

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

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

Exclusion Guidelines

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) Parkway 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).

Applicable Laws

Food Safety and Quality Act 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling or storing of animals or parts of animals.

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

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 pit bulls) 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.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Parkway may request verification from the customer.

Care and Control of the Animal:

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

Allergies

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Parkway will make all reasonable efforts to meet the needs of all individuals.

D. The Use of Support Persons

If a customer with a disability is accompanied by a support person, Parkway 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.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations Parkway will make every reasonable attempt to resolve the issue.

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.

Admission Fees

Where Parkway requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, Parkway will not charge the support persons any fees or fares.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Parkway. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Parkway's goods or 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 the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur Parkway will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Parkway website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Customer Feedback

Parkway shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available by posting on our website under AODA Policy, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

Submitting Feedback

Customers can submit feedback to:

Nama Pinassi Human Resource Manager
905-561-1202 ext. 137
2333 Barton Street East Hamilton, On L8E 2W8
npinassi@parkwaymotors.ca

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so by requesting a form at Reception.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training

Training will be provided to:

- Every person who is an employee of, or a volunteer with, the provider.
- Every person who participates in developing the provider's policies.
- Every other person who provides goods, services or facilities on behalf of the provider.

Training Provisions

Regardless of the format, 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 Customer Service Standards.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions 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.
- 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.
- Parkway's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

Parkway Motors Hamilton Ltd. will provide training as soon as practicable. A copy of Parkway Motors Hamilton's AODA Policy is given to each new employee as part of the new hire package in which they are given time to review the policy and ask any questions if necessary. Online training will then be provided to new employees, volunteers, agents, and contractors **within 3 weeks of employment start date**. Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

Record of Training

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

H. Notice of Availability and Format of Documents

Parkway shall notify customers that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information on the website and/or any other reasonable method.

AODA – INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) INFORMATION AND COMMUNICATIONS POLICY

Intent

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Information and Communications Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of information and communications services and materials for people with disabilities.

All information and communications materials and services provided by Parkway shall follow the principles of dignity, independence, integration and equal opportunity.

Definitions

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready– An electronic or digital format that facilitates conversion into an acceptable format.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. [General Requirements](#)
- B. [Feedback Process](#)
- C. [Accessible Formats and Communication Supports](#)
- D. [Accessible Websites and Web Content](#)
- E. [Exceptions](#)
- F. [Review](#)

A. General Requirements

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

Establishment of Accessibility Policies and Plans

Parkway will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Parkway will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

Parkway will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and to meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

Parkway will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Our policies and procedures will be updated when there are changes in legislation.

Training Requirements

Parkway Motors Hamilton will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Parkway's policies, and all other persons who provide goods, services or facilities on behalf of Parkway.

Training will be provided as soon as is reasonably practicable, but no later than January 1st, 2016. Training will be provided on an ongoing basis to new employees and as changes to Parkway's accessibility policies occur.

Records

Parkway will maintain records on the training provided, when it was provided and the number of employees that were trained.

B. Feedback Process

Parkway will ensure that all feedback processes (both internal and external) are made accessible to clients/customers or employees, upon request.

In accordance with the customer service standards, Parkway will make known the availability of accessible feedback formats.

C. Accessible Formats and Communication Supports

Unless deemed [unconvertible](#) Parkway will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual. ,

Parkway will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Parkway will make the availability of accessible formats and communication supports publicly known.

E. Accessible Websites and Web Content

Parkway will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.

F. Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Parkway will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Parkway will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

G. Review

This policy will be reviewed regularly to ensure that it is reflective of Parkway's current practices and legislative requirements.

AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

Intent

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Employment Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of accessible employment services for persons with disabilities.

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

Definitions

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Kiosk – An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. [General Requirements](#)
- B. [Recruitment, Assessment and Selection](#)
- C. [Accessible Formats and Communication Supports for Employees](#)
- D. [Workplace Emergency Response Information](#)
- E. [Documented Individual Accommodation Plans](#)
- F. [Performance Management and Career Development and Advancement](#)

G. [Return to Work](#)

H. [Redeployment](#)

I. [Review](#)

A. General Requirements

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

Establishment of Accessibility Policies and Plans

Parkway will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Parkway will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

Parkway will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

Parkway will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement Parkway's accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

Training Requirements

Parkway will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Parkway's policies, and all other persons who provide goods, services or facilities on behalf of Parkway.

Training will be provided as soon as is reasonably practicable, but no later than January 1st, 2016. Training will be provided on an ongoing basis to new employees and as changes to Parkway's accessibility policies occur.

Records

Parkway will maintain records on the training provided, when it was provided and the number of employees that were trained.

B. Recruitment, Assessment and Selection

Parkway will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Parkway will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Parkway's policies and supports for accommodating people with disabilities.

C. Accessible Formats and Communication Supports for Employees

Parkway will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Parkway will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

Parkway will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

D. Workplace Emergency Response Information

Where required, Parkway will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Parkway reviews general emergency response policies.

E. Documented Individual Accommodation Plans

Parkway will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines.

Parkway must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

The ways in which the employee can participate in the development of the plan;

The means by which the employee is assessed on an individual basis;

The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;

The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;

- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:

- Include information regarding accessible formats and communication supports upon request;
- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

F. Performance Management and Career Development and Advancement

Parkway will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

Individual accommodation plans will be consulted, as required.

G. Return to Work

Parkway will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Parkway will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

H. Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

Individual accommodation plans will be consulted, as required.

I. Review

This policy will be reviewed regularly to ensure that it is reflective of Parkway's current practices as well as legislative requirements.

Administration

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

Nama Pinassi/Human Resources

905-561-1202 ext. 137

2333 Barton Street East

Hamilton, ON L8E 2W8

npinassi@parkwaymotors.ca

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