

## MEMORANDUM

To: KP Canada Staff  
Copy To:  
From: Amanda Daigle  
Re: Accessible Customer Service Policy

Date: December 3, 2012  
File No.: NB108-189/6-A.01  
Cont. No.: NB12-00146

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### 1.0 PURPOSE

This policy is intended to meet the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and 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 Knight Piésold Ltd. (KPL) shall follow the principles of dignity, independence, integration and equal opportunity.

### 2.0 SCOPE

The Accessible Customer Service Policy applies to the provision of goods and services at premises owned and/or operated by KPL. This policy also applies to employees, sub-consultants and/or contractors who deal with the public or other third parties that act on behalf of KPL, including when the provision of goods and services occurs off the premises of KPL such as in the field. All persons who participate in the development of KPL's policies, practices and procedures governing the provision of goods and services to members of the public or third parties shall also follow this policy. Furthermore, 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/or operated by KPL.

### 3.0 DEFINITIONS

Assistive Device - 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 moving, breathing, hearing, seeing, communicating, 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 - 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 - As reflected in *Ontario Regulation 429/07*, 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
- If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability

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
- 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.

#### **4.0 GENERAL PRINCIPLES**

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

##### **The Provision of Goods and Services to Persons with Disabilities**

KPL 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
- Communicating in a manner that takes into account the customer's disability

##### **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 KPL.

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. If elevators are not present or operational and where an individual requires assistive devices for the purposes of mobility, service will be provided in another location that meets the needs of the customer. We will ask the person 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 assistance to the person with a disability.

### **The Use of Guide Dogs, Service Animals and Service Dogs**

Persons with a disability that are 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.

#### 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, KPL may request verification.

Verification may include:

- A letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability
- A valid identification card signed by the Attorney General of Canada
- A certificate of training from a recognized guide dog or service animal training school

#### Care and Control of the Animal:

The person that 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, KPL will make all reasonable efforts to meet the needs of all individuals. This may include making sure the party(s) that are allergic will not come into contact with the service animal.

### **The Use of Support Persons**

If a person with a disability is accompanied by a support person, KPL 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 visiting parties, prior to any conversation where confidential information might be discussed.

### **Notice of Service Disruptions**

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

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
- A description of alternative services or options

Notifications will be posted on Knight Piésold's website and possibly in hard copy on the premises if applicable. Other forms of notification could include:

- Contacting the person and/or parties who have scheduled meetings or appointments at the KPL office
- Any other method that may be reasonable under the circumstances

### **Customer Feedback**

KPL shall provide all customers with the opportunity to provide feedback on the service provided to customers with disabilities. Customers can submit feedback by mail, telephone or email to:

Anne Haskins,  
Manager - Human Resources  
Suite 1400 - 750 West Pender  
Vancouver , British Columbia Canada V6C 2T8  
Phone: 1-604-685-0543  
Email: [ahaskins@knightpiesold.com](mailto:ahaskins@knightpiesold.com)

Amanda Daigle,  
Senior Admin Assistant  
1650 Main Street West  
North Bay, Ontario Canada P1B 8G5  
Phone: 1-705-476-2165  
Email: [adaigle@knightpiesold.com](mailto:adaigle@knightpiesold.com)

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

### **Training**

Training will be provided to:

- Employees/persons to whom this Policy applies who deal with the public or other third parties that act on behalf of KPL
- Those who are involved in the development and approval of customer service policies, practices and procedures

#### Training Provisions:

As reflected in *Ontario Regulation 429/07*, 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 *Accessibility Standards for Customer Service, Ontario Regulation 429/07*
- 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
  - require the use of a support person
- Instructions on what to do if a person with a disability is having difficulty accessing your services
- KPL's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities

#### Training Schedule:

KPL will provide training as soon as practicable. Revised training will be provided in the event of changes to this Policy or any related changes to legislated procedures and/or policies.

#### Record of Training:

KPL will keep a record of training that includes the dates training was provided and, the number of employees who attended the training if the training is completing in a group setting.

**Notice of Availability and Format of Required Documents**

KPL shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by KPL, on KPL's website and/or any other reasonable method. Upon request, reasonable attempts will be made to provide this document to clients with in a format that takes into account the person's disability.

**5.0 ADMINISTRATION**

This policy and its related procedures will be reviewed as required in the event of legislative changes. KPL will also keep records of all reported incidents.

**6.0 REFERENCED DOCUMENTS**

HR Downloads, *A Practical Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07 April 4, 2011*. Available at: <http://www.hrdownloads.com>

Ministry of Community and Social Services, January 2008. Updated April 2009, *Accessibility Standards for Customer Service, Ontario Regulation 429/07, Employer Handbook*. Available at: [http://www.mcscs.gov.on.ca/documents/en/mcscs/accessibility/Tools/AO\\_EmployerHandbook.pdf](http://www.mcscs.gov.on.ca/documents/en/mcscs/accessibility/Tools/AO_EmployerHandbook.pdf)

Service Ontario E-Laws, *Accessibility for Ontarians with Disabilities Act, 2005*. Available at: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_05a11\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm)

Service Ontario E-Laws, *Blind Persons' Rights Act R.S.O. 1990*. Available at: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90b07\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90b07_e.htm)

Service Ontario E-Laws, *Dog Owners' Liability Act, Ontario R.S.O. 1990*. Available at: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90d16\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90d16_e.htm)

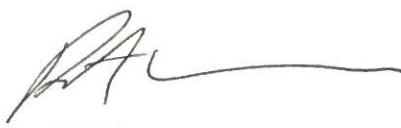
Service Ontario E-Laws, *Health Protection and Promotion Act, Ontario R.R.O. 1990, Regulation 562*. Available at: [http://www.e-laws.gov.on.ca/html/regs/english/elaws\\_regs\\_900562\\_e.htm](http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_900562_e.htm)

Service Ontario E-Laws, *Ontario Human Rights Code, R.S.O. 1990*. Available at: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90h19\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm)

Signed:

  
Amanda Daigle  
Senior Admin Assistant

Approved:

  
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Managing Principal, North Bay

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