Child Care Policy and Procedure Manual	
Section 4: General Policies and Procedures	**Policy:** Accessible Customer Service
Date Approved by P&P Cmte: Sept. 19, 2014 **Date Approved by BofD:** November 11, 2014	**Policy #** 4.3

PURPOSE

To meet the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005, (AODA) and the Integrated Accessibility Standards Regulation (IASR).*as 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 Bright Starts Co-operative Early Learning Centre Inc. (Bright Starts CELC) shall follow the principles of dignity, independence, integration and equal opportunity.

POLICY

Bright Starts CELC provides service to all children and their families and is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by using reasonable efforts to remove and prevent barriers to accessibility and meeting our accessibility requirements under the Accessibility for AODA's accessibility laws.

a) This policy applies to the provision of goods and services offered by Bright Starts CELC, both on or off its premises (e.g., field trips). Goods and services to persons with disabilities, and others, will be integrated unless an alternate measure is necessary, whether temporary or permanent, to enable a person with a disability to obtain, use or benefit from the goods and services.

b) People with disabilities may use assistive devices, guide animals and/or support persons in the access of goods and services.

c) This policy applies to Bright Starts CELC staff who interact with the public or third parties as well as all persons involved in the development of policies, practices and procedures pertaining to the provision of goods and services to members of the public or third parties, whether they do so as employees or volunteers.

Definitions

The AODA and IASR contain and refer to various definitions that are relevant to this policy, some of which are set out below.

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; brain injury; any degree of paralysis; amputation; lack of physical co-ordination; blindness or visual impediment; deafness or hearing impediment; muteness or speech impediment; 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.

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

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.

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 – 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; or
- if the person provides a letter from a physician, nurse, psychologist, psychotherapist, audiologist, chiropractor or optometrist 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;
- 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.

General Principles

In accordance with the *Accessibility for Ontarians with Disabilities Act, 2005, (AODA) and the Integrated Accessibility Standards Regulation (IASR),* 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. Communication
I. Notice of Availability and Format of Required Documents
J. Employment

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

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) Bright Starts CELC 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:

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.

Care and Control of the Animal:

The customer 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, Bright Starts CELC will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a customer with a disability is accompanied by a support person, Bright Starts CELC 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 Bright Starts CELC 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.

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 Bright Starts CELC. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Bright Starts CELC'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
- a description of alternative services or options

Notifications Options:

When disruptions occur Bright Starts CELC will provide notice by:

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

F. Feedback Process

Bright Starts CELC welcomes and appreciates all feedback, we will provide customers with the opportunity to provide feedback, including complaints on the service provided to our customers with disabilities via verbal (i.e. in person or by phone), written (i.e. hand-written or e-mail). Feedback forms will be available upon request.

Submitting Feedback:

Customers can submit feedback to:

- Stacey Reid, Executive Director
- Phone: (519) 888 - 4975
- E-mail: stacey@brightstartsearlylearning.ca
- Mail to: Bright Starts Co-operative Early Learning Centre Inc.
  University of Waterloo
  C/O Stacey Reid
  200 University Ave W
  Waterloo ON N2L 3G1

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

G. Training

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:
a) all persons who participate in developing the organization's policies; and
b) all other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training Provisions:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

Training Schedule:

Bright Starts CELC will provide training as soon as practicable after being hired and provide training in respect of any changes to the policies..

Record of Training:

We maintain records of the training provided, including the dates on which the training was provided and the number of individuals to whom it was provided.

H. Information and Communication

Bright Starts CELC communicates with people with disabilities in ways that take into account their disability. This may include the following:

- by telephone, in person, in writing through Canada Post, facsimile, or by e-mail and will work with the person with disabilities to determine what method of communication works for them.

- Bright Starts CELC employees will be trained to communicate with individuals over the telephone and in person in clear and plain language and to speak clearly and slowly.
- When asked, we will provide information about our organization and its services, including public safety information, in accessible formats (hard copy, large print, e-mail, verbal notification or with communication supports):
    A. in a timely manner, taking into account the person's accessibility needs due to disability; and
    B. at a cost that is no more than the regular cost charged to other persons.

I. Notice of Availability and Format of Documents

Bright Starts CELC 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 Bright Starts CELC and/or any other reasonable method.

J. Employment

Bright Starts CELC will notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

A. information that is needed in order to perform the employee's job; and
B. information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

A. when the employee moves to a different location in the organization;
B. when the employee's overall accommodations needs or plans are reviewed; and
C. when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

Administration

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

- Stacey Reid, Executive Director
- Phone: (519) 888 - 4975
- E-mail: stacey@brightstartsearlylearning.ca
- Mail to: Bright Starts Co-operative Early Learning Centre Inc.
  University of Waterloo
  C/O Stacey Reid
  200 University Ave W
  Waterloo ON., N2L 3G1

Date of Issue/Revision	Description of Change	Approved By
January 16, 2024	Revision	Executive Director
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