
**ACCESSIBLE CUSTOMER SERVICE
POLICY**

AND

**INTEGRATED ACCESSIBILITY
STANDARDS POLICY**

**CARTERS PROFESSIONAL
CORPORATION**

June 30, 2021

SECTION I.

ACCESSIBLE CUSTOMER SERVICE POLICY FOR CARTERS PROFESSIONAL CORPORATION

Dated the 30th day of June, 2021

Date of Board Approval: June 30, 2021

1.01 Providing Services to People with Disabilities

CARTERS PROFESSIONAL CORPORATION (hereinafter “Carters”) is committed to ensuring equal access and participation for people with disabilities. 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 removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario’s accessibility laws.

1.02 Purpose

The purpose of this Accessible Customer Service Policy is to fulfill the requirements set out in Part IV.2 of Regulation 191/11 of the [*Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)*](#) and to establish a policy for Carters that governs the provision of its services to persons with disabilities.

1.03 Policy Overview

These policies and procedures apply to all services that are delivered by Carters, by any means including, but not limited to, services in person, by telephone, electronically, by mail, visually, orally or by written means. Carters reviews and updates the firm’s practices and procedures regularly.

1.04 **Scope**

The policy applies to all Carters employees, volunteers and third parties who deal with the public, on behalf of Carters.

1.05 **Definitions**

For the purposes of the Policy and the Integrated Accessibility Standards Policy (Part II of this document), the terms below are defined as follows:

“Accessibility standard” means an accessibility standard made by regulation under section 6 of the AODA.

“Accessible formats” may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.

“Accommodation” means the arrangements made, or assistance provided, so that persons with disabilities can participate in the experience available to persons without disabilities, subject to reasonable limits prescribed by the Ontario *Human Rights Code*.

“Barrier” means 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, an attitudinal barrier, a technological barrier, a policy or a practice; (“obstacle”)

“Communications supports” may include, but are not limited to, captioning, alternative and augmenting communication supports, plain language, sign language, and any other supports that facilitate effective communications.

“Assistive Devices” mean devices used by persons with disabilities in order to allow equal opportunity and access to particular activities or services, as well as devices required for the maintenance of a person’s health and well-being, including but not limited to walkers, wheelchairs, white canes, note-taking devices and personal oxygen tanks to assist breathing.

“Disability” means,

- (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*.

“Regulations” means the regulations made under the AODA, unless the context indicates or requires otherwise.

“Service Animal” means an animal that is required by a person with a disability, for reasons relating to the disability.

“Undue Hardship” means the point at which the challenges to accommodate a person with a disability become so great that they are prohibitive. The Ontario *Human Rights Code* provides that whether individual has been accommodated to the point of undue hardship is determined by considering cost, outside sources of funding and health and safety requirements.

1.06 Policy

Carters is committed to delivering all of its services in a manner that respects the dignity, individuality and independence of persons with disabilities. Carters undertakes to ensure that individuals with disabilities are given equal access to opportunities to obtain, use and benefit from its services. As much as possible, such services will be integrated with the services that Carters delivers to all of its clients, unless alternative measures are necessary. As such, Carters shall meet its duties and responsibilities under the AODA, by adhering to the following principles and practices:

(a) Assistive devices

Carters recognizes that persons with disabilities may require the use of assistive devices. As such, Carters will take all reasonable measures to ensure that its premises are conducive to the use of such devices. Carters employees will make all necessary accommodations, up to the point of undue hardship on Carters, to enable clients to use assistive devices as required to access its services. Further, Carters employees will be trained and familiar with various assistive devices that may be used by clients with disabilities while accessing its services.

(b) Communication

Carters recognizes that persons with disabilities may have special requirements in terms of communications. Carters undertakes to communicate with persons with disabilities in ways that take into account their disability.

(c) Service animals

Carters allows service animals on the parts of its premises that are open to the public and in all situations where a person with a disability requires the service animal to access Carters' services, unless the animal is excluded by law from the premises. Carters will also be sensitive to any accommodations that may be necessary as a result of the use of a service animal.

When employees cannot easily identify that an animal is a service animal, employees may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- ♦ College of Audiologists and Speech-Language pathologist of Ontario
- ♦ College of Chiropractors of Ontario

- ♦ College of Nurse of Ontario
- ♦ College of Occupational Therapists of Ontario
- ♦ College of Optometrists of Ontario
- ♦ College of Physicians and Surgeons of Ontario
- ♦ College of Physiotherapists of Ontario
- ♦ College of Psychologists of Ontario
- ♦ College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

(d) Support persons

Carters is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter any of Carters' premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on Carters' premises.

(e) Notice of temporary disruption

Carters will give notice of temporary disruptions to services or facilities used by persons with disabilities in order to obtain, use or benefit from its services. Such notice will include the reason(s) for the disruption, the anticipated duration of the disruption and a description of alternative facilities, if any, that will be available during the disruption. The notice shall be posted at a conspicuous place at the facility and on Carters' web site when appropriate. When the disruption is planned, advanced notice will be provided. Where the disruption is anticipated to affect individuals with visual or written comprehension impairments, steps will be taken to notify these individuals in a manner appropriate to their needs.

(f) Training for employees

Carters will provide training to employees and direct service volunteers who deal with the public or other third parties on its behalf and all those who are involved in the development and approvals of customer service policies, practices and procedures. Such training will be provided to each person as soon as practicable after he or she is assigned the applicable duties, and on an ongoing basis in connection with any changes in the law, policy, practices and procedures related to the provision of services to persons with disabilities.

Carters will ensure that the format for employee training is accessible and available in multiple formats, including, but not limited to, face to face classroom instruction, online training modules, and other formats as may be required. Carters will keep records of such employee training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

Mandatory employee training includes:

- ◆ An overview of the AODA and the requirements of the customer service standards (http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm)
- ◆ Carters's Accessible Customer Service Policy
- ◆ How to interact and communicate with people with various types of disabilities
- ◆ Training videos from accessforward.ca including the following title:
 - (a) Customer Service Standard
 - (b) General Requirements
 - (c) Information and Communications Standard
 - (d) Employment Standard
 - (e) Design of Public Spaces Standard
 - (f) Transportation Standard

Up to and including 2020, training also included:

- ◆ 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 TTY, accessible doors and any other accessibility equipment.
- ◆ How to use any equipment, devices and strategies that may help with the provision of goods or services to a person with a disability
- ◆ What to do if a person with a disability is having difficulty in accessing Carters's services.

(g) Feedback process

Persons who wish to provide feedback on the way Carters provides services to people with disabilities can direct feedback to the Operations Manager, Wendy Speziali, at admin@carters.ca or by phone at 519-942-0001 x229. :

All feedback will be directed to the office of the President. Persons can expect to receive a response within ten (10) business days. Complaints will be addressed according to Carters' regular complaint management procedures.

(h) Customer Service

Carters continues to remain in compliance with the Customer Service Standard. Customer feedback can be submitted by email to admin@carters.ca. We continue to identify and address potential barriers that prevent people from giving feedback.

(i) Past Achievements to Remove and Prevent Barriers

All three of the Carter offices, in Toronto, Ottawa and Orangeville, are wheelchair accessible with ramps and elevators in place. Accessible washroom facilities have been in place since Carters' inception. Our websites are WACG 2AA compliant. Carters strives to improve accessibility for people with disabilities and to meet the requirements of the Accessibility for Ontarians with Disabilities Act.

(j) Availability of this policy

This policy is available to all clients on the www.carters.ca website. If a person with a disability requests a copy of this policy, Carters will deliver the policy in a format that takes into account the person's disability.

(k) Modifications to this or other policies

Any Carters policy that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

SECTION II.

INTEGRATED ACCESSIBILITY STANDARDS POLICY FOR CARTERS PROFESSIONAL CORPORATION

1.01 Statement of Commitment

Carters strives to ensure an accessible environment for all persons with disabilities, and will continue to build upon and improve its practices, in addition to ensuring that it meets the accessibility needs of persons with disabilities in a timely manner, consistent with the specific requirements of the AODA and its regulations.

This policy will be implemented in accordance with the time frames established by the [Integrated Accessibility Standards Regulation \(IASR\)](#), O. Reg. 191/11.

1.02 Accessibility Plan

If required pursuant to the provisions of the IASR, Carters will develop, maintain, and document an Accessibility Plan outlining Carters' strategy to prevent and remove barriers and to meet its requirements under the IASR.

Once required and adopted by Carters, any Accessibility Plan will be reviewed and updated at least once every five years. Upon request, Carters will provide a copy of the Accessibility Plan in an accessible format. At this time no Accessibility Plan is required pursuant to the IASR.

1.03 Training Employees and Volunteers

Carters will ensure that it provides training on the requirements of the accessibility standards referred to in the IASR and will provide training on the *Human Rights Code* as it pertains to persons with disabilities to:

- ◆ all its employees and volunteers;
- ◆ all persons who participate in developing Carters' policies; and,
- ◆ all other persons who provide goods, services or facilities on behalf of Carters.

The training will be appropriate to the duties of the employees, volunteers, and other persons. Employees will be trained when changes are made to this Policy. New employees will be trained upon commencement of employment.

Carters will keep a record of the training it provides.

1.04 Information and Communications Standards

(a) Feedback

Carters will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports upon request.

(b) Accessible Formats and Communications Supports

Upon request, Carters will provide, or will arrange for the provision of, accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to a disability.

Carters will consult with the person making the request when determining the suitability of an accessible format or communication support.

Carters will also notify the public about the availability of accessible formats and communication supports.

Carters will continue to make use of office software that uses a structured electronic format to prepare documents, policies and multi-year plans in order to easily convert to an alternate accessible format such as a web page, large print, braille or audio version.

(c) Accessible Websites and Web Content

Carters internet website and web content will conform with the World Wide Web Consortium Web Accessibility Guidelines (WCAG) 2.0 AA. Currently, all internet website and web content backdated to 2012 conforms to WCAG 2.0 Level AA, except where this is impracticable, in accordance with the IASR by January 1, 2021. The websites are screen-reader compatible and has alternate text on all pictures. The font size can be increased and decreased on the website. If a substantive renovation of Carters website is made, the requirements of the WCAG 2.0 will be included in the design.

1.05 Employment Standards

(a) Recruitment

Carters will notify its employees, and the public, about the availability of accommodation for applicants with disabilities in its recruitment process.

(b) Recruitment, Assessment or Selection Process

Carters will notify job applicants, when individually selected for further participation in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Carters will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability.

(c) Notice to Successful Applicants

When making offers of employment, Carters will notify the successful applicant of its policies for accommodating employees with disabilities.

(d) Informing Employees of Supports

Carters will inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to a

disability. This information will be provided to new employees as soon as practicable after commencing employment.

(e) Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Carters will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Carters will consult with the employee making the request.

(f) Workplace Emergency Response Information

If Carters is aware of the need for accommodation due to an employee's disability, Carters will provide individualized workplace emergency response information if the disability is such that the individualized information is necessary. Carters will provide this information as soon as practicable upon becoming aware of the need for accommodation.

Where the employee requires assistance, Carters will, with the consent of the employee, provide the workplace emergency response information to the person designated by Carters to provide assistance to the employee.

Carters will review the individualized workplace emergency response information when the employee moves to a different location in Carters, when the employee's overall accommodation needs or plans are reviewed, and when Carters reviews its general emergency response policies.

(g) Documented Individual Accommodation Plans

Carters shall put in place a written process for developing individual accommodation plans for employees with disabilities.

If requested, information regarding provided accessible formats and communication supports will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

(h) Return to Work Process

Carters will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

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The return to work process will outline the steps that Carters will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other applicable statute.

(i) Performance Management, Career Development and Advancement & Redeployment

Carters will continue to take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement, or when redeploying employees.

1.06 Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

When the *Accessibility Standards for the Built Environment* come into force in 2025, Carters will be committed to designing public spaces that are free from barriers and accessible to all

persons it serves in accordance with that regulation. Carters will comply with the applicable standards with respect to public spaces that are newly constructed or redeveloped, including:

- ◆ Outdoor public use eating areas
- ◆ Outdoor play spaces
- ◆ Exterior paths of travel
- ◆ Accessible parking
- ◆ Service related elements, such as service counters and waiting areas.