

Accessibility for Ontarians with Disabilities Act Policy

February 2013

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Bel-Air Automobiles Inc.

Bel-Air Automobiles Inc.
Human Resources
440 McArthur Ave
Ottawa ON K1K 1G4

December 15, 2011

Dear Employee,

This letter is to inform you about the *Accessibility for Ontarians with Disabilities Act*. The Act was passed in 2005 and the intention is to make Ontario completely accessible by 2025. There are five standards that are outlined in the Act: customer service; the built environment (building and structures); employment; information and communications; and transportation. The first standard that is required to be met under this legislation is the *Accessibility Standard for Customer Service* which is intended to ensure that individuals with disabilities will receive fully accessible, high quality customer service. All organizations that have more than one employee are required to comply with this standard by January 1, 2012.

Our organization will be rolling out new policies, procedures and training for all employees in order to report compliance for December 31, 2012. The policies, practices and procedures for providing compliant customer service are outlined below.

This policy complies with the *Accessibility Standard for Customer Service* and has been created by Bel-Air Automobiles Inc. and outlines: the provision of goods and services to persons with disabilities; the use of assistive devices; the use of guide dogs, service animals and service dogs; the use of support persons; notice of service disruptions; customer feedback; training; and the notice of availability and format of documents.

In order to comply with the *Accessibility Standard for Customer Service*, Bel-Air Automobiles Inc. will develop strategies that consider customers and take into account individual disabilities. Customers will be able to use their own personal assistive devices when accessing Bel-Air Automobiles Inc.'s services, and in the event that the assistive device presents a safety concern or where accessibility might be an issue, we will develop additional measures to enable access of goods and services by the customer.

Customers with disabilities will also be able to be accompanied by a guide dog, service dog and/or service animal unless prohibited by law. If the animal is prohibited by law, Bel-Air Automobiles Inc. will take reasonable measures to ensure the customer has access to the goods and/or services required. Any customers that require the assistance of a support person may be accompanied while accessing the goods and services of Bel-Air Automobiles Inc. In the event of Accessibility for Ontarians with Disabilities Act

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a service disruption, we must include the reason, anticipated duration and alternative options to access goods and services.

Bel-Air Automobiles Inc. will also develop a process for accepting customer feedback, including how it will be recorded, responded to and handled. Information will be made available to customers about Bel-Air's feedback process.

In addition to the above requirements, all employees will be trained on the following in order to ensure compliance to the Act:

- Accessibility for Ontarians with Disabilities Act, 2005.
- Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- How to interact and communicate with customers with various types of disabilities.
- How to interact with people with disabilities who use assistive devices; require the assistance of a guide dog, service animal or service dog; or require the use of a support person.
- What to do if a customer with a disability is having difficulty accessing your service.
- Developed policies, procedures and practices surrounding the legislation.

All records of training including the dates training was provided and the number of employees who attended will be required in order to meet reporting compliance.

If you require any further information about the *Accessibility for Ontarians with Disabilities Act* or the *Accessibility Standard for Customer Service* please contact Josianne Parent McNaught.

Sincerely,

Michel Parent
Dealer Principal

Accessible Customer Service Policy

Intent

This policy is intended to meet the requirements of *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 Bel-Air Automobiles Inc. shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by Bel-Air Automobiles Inc..
- b) This policy applies to employees who deal with the public or other third parties that act on behalf of Bel-Air Automobiles Inc., including when the provision of goods and services occurs off the premises of Bel-Air Automobiles Inc. such as in: delivery services, call centers, drivers and third party marketing agencies.
- c) 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 operated by Bel-Air Automobiles Inc..

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

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- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

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; or
- 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;
- 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 – 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.

General Principles

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, 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

Bel-Air Automobiles Inc. 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;

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- 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 Bel-Air Automobiles Inc..

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.

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 pitbulls) 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, Bel-Air Automobiles Inc. may request verification from the customer.

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; or,
- a certificate of training from a recognized guide dog or service animal training school.

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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, Bel-Air Automobiles Inc. 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, Bel-Air Automobiles Inc. 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 Bel-Air Automobiles Inc. 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 Bel-Air Automobiles Inc.. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Bel-Air Automobiles Inc.'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: (please see Appendix B-I and B-II)

- 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 Bel-Air Automobiles Inc. 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 Bel-Air Automobiles Inc. website;
- contacting customers with appointments;
- verbally notifying customers when they are making a reservation or appointment; or

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- by any other method that may be reasonable under the circumstances.

F. Feedback Process

Bel-Air Automobiles Inc. 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 as per Bel-Air OADA policies. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request. (please see Appendix A)

Submitting Feedback:

Customers can submit feedback to:

- Josianne Parent McNaught
- 613-746-8178
- 435 McArthur Avenue & 445 McArthur Avenue, Ottawa, ON K1K 1G4
- josianne@belairlexus.com
- www.belairlexus.com

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Bel-Air Automobiles Inc. receptionists or managers. Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted within the next 5 business days. (please see Appendix C)

G. Training

Training will be provided to:

- a) all employees who deal with the public or other third parties that act on behalf of Bel-Air Automobiles Inc.; for example: salespersons, drivers, call centers etc...
- b) 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; or
 - require the use of a support person (including the handling of admission fees).

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- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Bel-Air Automobiles Inc.'s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Bel-Air Automobiles Inc. will provide training as soon as practicable. Training will be provided to new employees who deal with the public or act on our behalf in every orientation. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

Bel-Air Automobiles Inc. will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents

Bel-Air Automobiles Inc. 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 Bel-Air Automobiles Inc., the Bel-Air Automobiles Inc.'s website and/or any other reasonable method.

Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*

Recognizing the history of discrimination against persons with disabilities in Ontario, the purpose of this Act is to benefit all Ontarians by developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025; and providing for the involvement of persons with disabilities, of the Government of Ontario and of representatives of industries and of various sectors of the economy in the development of the accessibility standards. 2005, c. 11

Communication with disabled clients

There are many degrees of disability. Openly communicating and responding to our customers needs is the key to excellent customer service for all. If you are not sure about the best approach, politely ask a person with a disability how you can best communicate with them

People with physical disabilities:

Only some people with physical disabilities use a wheelchair. Someone with a spinal cord injury may use crutches while someone with severe arthritis may have difficulty walking long distances.

- If you need to have a lengthy conversation, consider sitting so you can make eye contact at the same level.
- Don't touch items or equipment unless given permission
- If given permission to move their wheelchair, don't leave them in an awkward or dangerous position such as facing a wall or in the path of doors.

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People with vision loss

Vision loss can restrict someone's ability to read or see hazards. Some customers may have a guide dog or white cane, while others may not

- When you know someone has vision loss, don't assume they can't see you, many people still have sight
- Identify yourself when you approach and speak directly to the customer
- Ask if they would like you to read any material out loud to them
- Offer your elbow to guide them if needed

People with hearing loss

People who have hearing loss may be deaf, deafened or hard of hearing.

- Once a customer has identified themselves as having hearing loss, make sure you are in a well lit area where they can see your face and read your lips
- As needed, attract the customer's attention before speaking. Try a gentle touch on the shoulder or a small wave of the hand.
- If your customer uses a hearing aid, reduce background noise or move to a quieter area.
- If necessary, ask if another way of communicating would be easier (writing)

People who are deafblind

A person who is deafblind may have some degree of both hearing and vision loss. Many customers who are deafblind are likely to explain to you how to communicate with them with a note or assistance card.

People with speech or language impairments

Cerebral palsy, hearing loss or other conditions may make it difficult for a person to pronounce words or may cause slurring.

- Don't assume that a person with speech impairment has another disability.
- Whenever possible ask questions that can be answered with yes or no
- Be patient. Don't interrupt or finish your customers sentences

People with learning disabilities

- Be patient, people with some learning disabilities may take a little longer to process information, to understand and respond.
- Try to provide the information in a way that takes into account the customer's disability. Provide clear and simple information.

People with developmental disabilities

Such as Down Syndrome can limit a person's ability to learn, communicate and do everyday physical activities and live independently.

- Don't make assumptions about what a person can do
- Use plain language
- Provide one piece of information at a time

People with mental health disabilities

Mental health disabilities can affect a person's ability to think clearly, concentrate or remember things.

- If you sense or know that a customer has a mental health disability, make sure to treat them with the same respect and consideration you have for everyone else

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- Be confident, reassuring and calm
- If a customer seems to be in a crisis, ask them to tell you the best way to help

Interaction with people who use assistive devices etc...

People who use assistive devices

An assistive device is a tool, technology or other mechanism that enables a person with a disability to to everyday tasks and activities.

- Don't touch or handle any assistive devices without permission
- Don't move or assistive devices or equipment such as canes or walkers out of your customers reach
- Let them know about accessible features in the immediate environment (bathrooms)

People with Guide Dogs

People with vision loss may use a guide dog, but there are other types of animals as well.

- Remember that a service animal is not a pet. It is a working animal. Avoid touching or addressing them

People with a support person

Some people with disabilities may be accompanied by a support person, such as an intervener.

- Speak directly to the customer, not to their support person
- If you're not sure which person is the customer, take your lead from the person using or requesting your services, or simply ask.

Administration

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

- Josianne Parent McNaught
- 613-746-8178
- 435 McArthur Avenue & 445 McArthur Avenue, Ottawa, ON K1K
- josianne@belairlexus.com
- www.belairlexus.com

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

Referenced Documents:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Blind Person's Rights Act, 1990
- Dog Owners' Liability Act, Ontario
- Food Safety and Quality Act 2001, Ontario Regulation 31/05
- Health Protection and Promotion Act, Ontario Regulation 562
- Ontario Human Rights Code, 1990

Customer Service Feedback Form

Thank you for visiting Bel-Air Automobiles Inc.! We value all of our customers and strive to meet everyone's needs.

Please tell us the date and location of your visit:

Date: _____ Location: _____

1. Were you satisfied with the customer service we provided you?

--	--	--

Comments

2. Was our customer service provided to you in an accessible manner?

--	--	--

Comments

3. Did you experience any problems accessing our goods and services?

--	--	--

Comments

Contact Information (optional)

Name: _____ Phone Number: _____

Email: _____

Thank-you,
Bel-Air Automobiles Inc.

Notification of Service Disruption Form

In the event of planned or unplanned service disruptions, complete the following form to record actions taken by Bel-Air Automobiles Inc.

1. Goods or Services that are disrupted or unavailable:

2. Reason for the disruption:

3. Anticipated duration of the disruption:

4. If applicable, other services or options that are available:

5. If applicable, Companies or individuals notified to resolve service disruption:

Notification Requirements:

☐	All entrances	
☐	Location of service disruption	
☐	Website	
☐	Notified reservations	
☐	Other:	
☐	Other:	
☐	Other:	

Bel-Air Automobiles Inc.

Dear Valued Customers,

The (insert goods or services that are unavailable) will be out of service for (insert reason for disruption) from (insert appropriate date) until (if known, insert appropriate date).

The following alternative services and options are available:

- (list options)
-

We regret any inconvenience this may cause. If you have questions or concerns, please contact (Name, Title, E-mail, telephone).

Thank you for your understanding and patience. We appreciate your business, and look forward to seeing you again soon!

Record of Customer Feedback

The record of customer feedback template will help you track customer feedback and look for common trends to address.

Customers should be able to provide feedback in a variety of methods. If the customer has shared a concern or negative experience, best practice is to call the customer and update them on any actions taken by the company.

Instructions:

Enter your data into the cells and it will be entered into a worksheet in the worksheet designed to work with the Customer Feedback Form.

Date (month/date/year)	
Location	
Customer Name	
Customer Contact Details	
Satisfactory Customer Service	Yes No Specify_____
Comments	
Problems Accessing Services?	Yes No Specify_____
Comments	
Additional Details	
Actions Taken	
Did the Customer Receive Feedback?	Yes No Specify_____
When did the Customer Receive Feedback?	
Employee Name	

