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Service Area:	Company Wide	Approval Date:	2021-11-17
Issuing Department:	Regulatory Affairs	Approved By:	EWU Board of Directors
Subject:	Accessible Customer Service Policy	Effective Date:	2021-12-01
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1.0 Purpose

ENWIN Utilities Ltd. (“EWU”) is committed to providing high-quality, cost-effective goods and services that keep pace with rising public expectations.

EWU strives to provide goods and services in a way that respects the dignity and independence of persons with disabilities. EWU is also committed to ensuring that customers with disabilities receive accessible goods and services with the same quality and timeliness as others do.

This policy is intended to fulfill the requirements set out in Ontario Regulation 429/07 of the Accessibility for Ontarians with Disabilities Act, 2005 (the “Act”), which include the establishment of a policy for EWU governing the provision of its goods and services to persons with disabilities.

2.0 Scope


2.1 This Policy shall apply to every person who deals with members of the public or other third parties on behalf of EWU in the course of delivering EWU’s goods and services, whether the person does so as an employee, Board member, agent, volunteer or otherwise.

2.2 This Policy shall also apply to all persons who participate in the development of EWU’s policies, practices and procedures governing the provision of goods and services to members of the public or third parties.


3.0 Definitions

3.1 “Agent” is a person or business providing goods or services on behalf of EWU through a contract or agreement.

3.2 “Assistive device” is a technical aid, communication device or medical aid that is used to increase, maintain or improve the functional abilities of persons with disabilities in seeing, hearing, speaking, mobility, walking, breathing, performing manual tasks, learning, working or self-care.

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- 3.3 “Customer” is, for the purposes of this policy, a person or a third party (i.e. a company or other organization that is not a person) who acquires goods and/or services from EWU.
- 3.4 “Disability” is defined, for the purposes of this policy and in accordance with the Act, as:
- (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*.
- 3.5 “Service animal” is a service animal for a person with a disability,
- (a) If it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - (b) If the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.


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A service animal includes but is not limited to a “Guide Dog” as that term is defined in section 1 of the *Blind Persons’ Rights Act*: “... a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.”

- 3.6 “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 or medical needs or with access to goods or services.
- 3.7 “Regulated Health Professional” is defined as a member of the following colleges:
- 3.7.1 College of Audiologists and Speech-Language Pathologists of Ontario,
 - 3.7.2 College of Chiropractors of Ontario,
 - 3.7.3 College of Nurses of Ontario,
 - 3.7.4 College of Occupational Therapists of Ontario,
 - 3.7.5 College of Optometrists of Ontario,
 - 3.7.6 College of Physicians and Surgeons of Ontario,
 - 3.7.7 College of Physiotherapists of Ontario,
 - 3.7.8 College of Psychologists of Ontario,
 - 3.7.9 College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

4.0 **Authority and Responsibilities**

- 4.1 **Director, Customer Service**
Ensures that EWU implements and updates this policy and related procedures as appropriate.

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4.2 Management

- Ensure that employees, volunteers and any third party who report to them or conduct business on their behalf are trained on accessible customer service following corporate standards.
- Ensure that procedures under this policy are communicated to staff and are carried out consistently.
- Ensure that feedback from the public regarding accessible customer service is addressed in accordance with the policy and related procedures.

4.3 Employees

- Ensure that accessible customer service is provided to all customers in accordance with the policy and related practices and procedures.

4.4 Records


- Documents generated as a result of this policy will be maintained in accordance with EWU's existing document management system.

5.0 Procedure

This policy is drafted in accordance with the Accessibility Standards for Customers (O. Reg. 429/07) and addresses the following:

- A. The provision of goods and services to persons with disabilities.
- B. The use of assistive devices by persons with disabilities.
- C. The use of service animals by persons with disabilities.
- D. The use of support persons by persons with disabilities.
- E. Communication with persons with disabilities.
- F. Notice of temporary disruption in services and facilities.
- G. Training.
- H. Customer feedback regarding the provision of goods and services to persons with disabilities.
- I. Notice of availability and format of documents.

EWU may from time to time retain third parties as its agent and/or contractors to provide certain services for and on behalf of EWU, including but not limited to billing and collection services, technical and customer services, information services and other related

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services. In order to comply with the provisions of the Act and its regulations, it is EWU's intention to require any such agent and/or contractor to confirm, in writing, that they are compliant with the provisions of the Act and its regulations in the performance of their services to EWU in order to attain compliance with the provisions of the Act and its regulations.

A. Principles for providing goods and services to people with disabilities.

EWU will make reasonable efforts to:

- provide its goods and services in a way that respects the dignity and independence of persons with disabilities;
- integrate the provision of goods and services to persons with disabilities and others, unless an alternate measure is necessary to enable a person with a disability to obtain, use or benefit from the goods or services;
- provide persons with disabilities an equal opportunity to access its goods and services and allow them to benefit from the same services, in the same place and in a similar way as other customers.


B. Assistive devices.

Customer's own assistive device(s)

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from EWU's goods and services unless otherwise prohibited by law (i.e.: health and safety reasons). In the event the assistive device(s) is prohibited by law, EWU may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from EWU's goods and services where EWU has such other measures available and the person so requests.

Assistive devices provided by EWU

EWU will ensure that staff know how to use assistive devices available in its various locations for customers, and it will inform customers of the assistive devices that are available. Available assistive devices and the procedure for accessing them are outlined in EWU's "*Customer Feedback Procedure.*"

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C. Use of Service Animals.

Persons with disabilities may bring their service animal on the parts of EWU premises that are open to the public or those areas of EWU premises where customers customarily have access to in order to receive EWU goods or services. EWU will ensure that all staff dealing with the public are trained in how to interact with persons with disabilities who are accompanied by a service animal.

On rare occasions, a manager may determine that a service animal cannot enter an area of the premises consistent with other laws. In these instances, the manager will suggest appropriate alternatives and provide assistance.

Care and Control of the Animal

A customer with a disability who is accompanied by a service animal must maintain care and control of the animal at all times.

Allergies

If a customer or staff member has a severe allergy to animals which could result in health and safety concerns, EWU shall make reasonable efforts to meet the needs of all individuals.

D. Use of Support Persons.


EWU is committed to welcoming persons with disabilities who are accompanied by a support person. If a support person accompanies a visiting person with a disability, EWU shall ensure that both persons are entitled to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

When a support person may be required

EWU may require a visiting person with a disability to be accompanied by a support person when on the premises to protect the health and safety of the person with a disability or the health and safety of others on the premises. Before making a decision, EWU will:

- (a) Consult with the person with a disability to understand their needs
- (b) Consider health or safety reasons based on available evidence

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(c) Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

In such a situation, EWU will waive the admission fee or fare for the support person, if one exists.

E. Communication with persons with disabilities.


EWU will endeavour to communicate with persons with disabilities in a manner that takes into account their disability. This means staff will communicate in a manner that enables persons with disabilities to communicate effectively for purposes of using, receiving and requesting EWU goods and services.

EWU will train staff who communicate with customers on how to interact and communicate with persons with various types of disabilities.

F. Notice of Temporary Disruption.

EWU will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services used by persons with disabilities. This notice will include information about the reason for the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services available (if any).

The notice will be placed at all public entrances and service counters on EWU premises and on the EWU website. Depending on the nature of the disruption, notice may be provided by other methods that are deemed reasonable in the circumstance.

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G. Training for Staff.


EWU will provide training to all employees, third parties working on behalf of EWU, volunteers and others who deal with members of the public in the provision of EWU goods or services (collectively referred to as “staff”). Training will also be provided all those who are involved in the development and approvals of customer service policies, practices and procedures.

New staff and staff who commence new duties that involve interaction with members of the public or other third parties receiving EWU goods and services will undertake training as part of their orientation, if they have not already done so.

EWU will provide staff with training that includes:

- A review of the purposes of the Act and the requirements of the Accessibility Standards for Customer Service;
- How to interact and communicate with persons with various types of disabilities;
- How to interact with persons 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 EWU’s premises, or otherwise, that may assist with the provision of goods or services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing EWU’s goods and services; and
- EWU policies, practices and procedures relating to the provision of goods or services to persons with disabilities.

Staff will be trained, as appropriate, on policies, practices and procedures that affect the way goods and services are provided to persons with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

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EWU shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.

H. Feedback process.

The ultimate goal of this policy is to meet service delivery expectations while serving customers with disabilities. Comments on EWU services regarding how well those expectations are being met are welcome and appreciated.

EWU must allow customers to submit their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on a storage device. If a method is not suitable, customers may request another method. Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve EWU services.

Where possible, complaints will be addressed immediately. However, some complaints may require more effort to address, and must be reviewed for action, possibly at a higher level. EWU will have a mechanism to allow the public to provide feedback on the accessibility of the provision of goods and services. Feedback/response will endeavour to be in a format that is accessible to the complainant.


More specific information about feedback procedures is set out in EWU's "*Customer Feedback Procedure*."

I. Notice of availability and format of documents.

EWU shall notify persons with disabilities to whom it provides goods or services that the documents required under the Act are available upon request and in a format that takes into account the person's disability. This notice may be given by posting the information at a conspicuous place in or on EWU's premises, on EWU's website and/or any other reasonable method.

6.0 Flowcharts

Nil.

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7.0 References and Related Documents

- Ontarians with Disabilities Act, 2001
- Accessibility for Ontarians with Disabilities Act, 2005
- Ontario Human Rights Code, 1990
- Dog Owner's Liability Act, 1990
- Blind Persons' Rights Act, 1990
- Ontario Regulation 562 – Health Protection and Promotion Act
- Ontario Regulation 429/07 – Accessibility Standards for Customer Service
- ENWIN Utilities Ltd. – Customer Feedback Procedure
- ENWIN Utilities Ltd. – Notice of Temporary Service Disruption Procedure
- ENWIN Utilities Ltd. – Availability of Accessible Customer Service Documents

8.0 Attachments

Nil.

9.0 Policy History and Approval

This policy was originally approved on: November 7, 2011

This version was approved on: November 17, 2021

This version takes effect from: December 1, 2021

This policy will be reviewed by: December 1, 2024

10.0 Contact Person

Director, Customer Service