

**Accessibility – Customer Service**

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**Department:** Legislative Services**Division:** City Clerk's Office**Section:** Accessibility**Approved By:** Peter Fay, City Clerk, July 7, 2021**Purpose:**

The purpose of the Accessibility – Customer Service Standard Operating Procedure is to outline the requirements of the Customer Service Standard established in the *Integrated Accessibility Standards Regulation (IASR)* under the *Accessibility for Ontarians with Disabilities Act (AODA)*.

The Customer Service Standard SOP will allow the City to meet individual and varying needs and help identify, remove and reduce barriers to ensure individuals of all abilities can fully participate and have equitable access to all aspects of the community. This includes but is not limited to accessing City services, facilities, programs, public information, volunteer/job opportunities, transportation services and public spaces.

**Scope:**

This procedure applies to City Council, employees, volunteers and those providing a good, service, program or facility on the City's behalf.

**Definitions & Acronyms:**

**3rd Party Agents:** Individuals the City contracts with to act on its behalf in the development, implementation and delivery of programs, services and goods.

**Contractor:** The company under contract to perform specified work on behalf of the City

**Feedback:** Identifies how the City will receive and respond to feedback from customers and employees with disabilities about the accessibility of goods and services.

**Mobility Device:** A device used to facilitate the transport of a person with a disability, such as scooters and manual and electric wheelchairs.

**Owner:** The contract "owner" is the City of Brampton.

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*Note: This SOP is to be read in conjunction with the Accessibility Policy, and additional definitions are available within the policy document.*

**Procedure:**

The procedures identified below details how the City will ensure customer service is accessible by all.

### Interacting with Individuals with Disabilities

When interacting with individuals with disabilities:

- Ask the individual who is there for service how you can assist them, and what their preferred method of assistance would be;
- Speak directly to the individual who is there for service. If the individual is difficult to understand, politely ask them to repeat what they have said or confirm via paraphrasing;
- Do not make assumptions about the type of disability a person has and what they can and cannot do;
- Do not touch assistive/mobility device(s) such as wheelchairs, without permission;
- Be clear – use plain language, avoid jargon, internal terms and acronyms when communicating
- Understand that not all methods of service will work for all individuals; and,
- Speak clearly, give the person sufficient time to explain themselves and do not finish the person's sentences.

### Accessibility Supports

The City recognizes the importance of the use of accessibility supports and provides training to staff on how to communicate with someone accompanied by a support person or using an assistive device.

#### Assistive Devices and Technologies

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Assistive devices and technologies are supports that may be used by persons with disabilities. Examples include but are not limited to: wheelchairs, pool wheelchairs, evacuation chairs, walkers, screen-reading devices, specialized computer/mobile software or apps, prostheses and hearing aids.

When serving customers with personal assistive devices and technologies, staff will:

- Permit the customer to enter the premises with their device, and have access to their device while accessing City goods, services and facilities in an integrated and equitable manner;
- Remove potential barriers to the use of personal assistive devices where possible; and,
- Respect the personal space and dignity of the customer and provide assistance upon request.

Assistive devices and technologies that are available for use at City facilities include but are not limited to: wheelchairs; magnifiers; assistive listening devices; adult change tables; pool and other lifts; automatic door operators; assistive technologies (may vary with each facility) and dual handset (language interpretation) telephones.

Additional supports and best practices that are available at Performing Arts Facilities include hearing assists devices; early admission for patrons who require additional time to get to their seats; and accessible/ barrier-free seating options.

### Use of Service Animals

Service animals are permitted and welcomed on all City property and facilities, including but not limited to City Hall, parks, recreation centers and the Performing Arts facilities.

Service animals may be used by, but are not limited to, individuals with:

#### Physical disabilities

1. Vision loss
2. Hearing loss
3. Autism
4. Intellectual or mental health disabilities
5. Individuals who require a psychiatric service dog

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Service animals are animals trained to perform specific functions and services to assist someone with a disability. For example, they may alert individuals to sounds, guide around obstacles, retrieve dropped articles, provide physical support, may include:

- Guide Dogs: Guide dogs may hear, see or assist persons with vision or hearing loss, autism, intellectual or mental health disabilities;
- Mobility Service Animals: Mobility service animals such as dogs, ponies and small horses may assist persons to pull wheelchairs, carry objects turn handles on doors, or push buttons; or,
- Medical Assist Animals: Seizure alert, assist or response animals have been trained to steer a person from dangerous situations; alert the owner of an oncoming seizure; or activate a medical alert.

It is the responsibility of the person with a disability to ensure their animal is always kept in control. Where animals are not permitted by law, the City will make every effort to provide alternate means to obtain or use the City's goods and services.

When serving customers with service animals, staff shall:

- Permit the customer to enter the premises with the service animal, unless prohibited by law, to access City information, services and facilities in an integrated and equitable manner;
- Allow the customer to keep the service animal with them in all public areas unless prohibited by law. The City must provide other options or arrangements to provide information or services in areas where the service animal is prohibited by law;
- Staff must respectfully explain why the service animal is excluded and determine what other arrangements can be made;
- Respect the personal space and dignity of both the customer and the service animal. Avoid speaking to, touching or making eye contact with the service animal;
- Make every effort to provide alternate means to obtain, use or benefit from the City's services when service animals are prohibited by law, or when the service animal is not kept in control.
- When serving two customers that have different needs, such as serving a customer that has a service animal and a customer that has an allergy to animals, staff will determine how to best meet the needs of both individuals and observe the rights of all individuals involved, according to the Ontario Human Rights Code; and/or,

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- Request that the person with a disability provide proof when it is not reasonably apparent that the animal is a service animal.

### Support Persons

A support person is an individual who accompanies a person with a disability to help with communication, mobility, personal care or medical needs, or with access to goods, services, and programs.

When serving customers accompanied by a support person, staff will:

- Allow both the customer and their support person to enter the premises or facility together to access City goods, services and facilities in an integrated and equitable manner;
- Ensure that the customer has access to their support person at all times while on City's premises;
- Obtain the customer's consent prior to discussing or sharing personal or confidential information when the support person is present;
- Ensure direct communication with the customer, not the support person unless directed is provided; and,
- Make every effort to accommodate the personal care needs of customers with support persons of different gender.

Support person request by the city:

- Staff should be aware that in situations where it is necessary to protect the health or safety of the customer, or the health and safety of others on the premises. The City may require an individual with a disability to be accompanied by a support person while on City premises, only after consulting with the customer; and,
- When a support person is required, the City will waive all fees for the necessary support person to participate and attend.

Additional information on accessibility supports can be found in the **Inclusive Customer Service - Resource Manual for Vendors**.

### Fares and Fees



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The City of Brampton waives Transit and Recreation fees for support persons, as identified in **By-Law 380-2003**.

Performing Arts facilities within the City including the Rose Theater, Cyril Clark and Garden Square, provides adjacent seating for support persons and offers a free ticket to any support person accompanying a patron who purchases a ticket to any event to City programming at The Rose Theater through the Easter Seals [Access 2 program](#).

### Notice of Service Disruptions

The City will notify the public when there is a temporary disruption of City services or facilities, for both planned and unexpected disruption and also for partial or whole disruptions.

These notifications are posted on the City's public website and should be posted on the door of a particular facility and/or in a location that is clearly visible.

The notice will include the following information:

- The reason for the disruption;
- The anticipated duration of the disruption;
- Contact details of an individual who can answer questions about the disruption, which shall include telephone number and E-mail address; and,
- Information about alternative accessible facilities or services that may be available.

Notice will be given by:

- Posting printed notices;
- Posting an electronic notice on the City's website; and/or,
- Automated telephone messages.

Timing of Notification:

- Notice of planned service disruptions will be provided a minimum of seven days in advance, and;
- Notice of unplanned service disruptions will be provided as soon as possible after the disruption has been reported.

Notice of service disruption must include:

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- Information about the reason for the disruption;
- The anticipated duration of the disruption;
- Contact details, which shall include telephone number and E-mail address; and,
- Information about alternative accessible facilities or services that may be available.

**Method of Providing Notice:**

A Service and Information Update template is used to communicate updates, changes and alerts that are relevant to Brampton residents and businesses. Examples of topics include Transit service changes, facility closures, emergency-related information etc.

Updates are posted on the City website, translated into top 10 languages spoken in Brampton, and distributed to mainstream media outlets, multilingual media and the City's own digital and social media channels.

For critical announcements impacting all residents, the City may also choose to issue a telephone "voice drop" message to the landlines of residents.

For all notice of service disruptions, staff will also:

- Prepare and post printed notice(s);
- Prepare and post an electronic notice to the City's website; [City of Brampton | Accessibility | Service Disruption Notices](#)
- Notify the Service Brampton Call Centre at 905-874-2000 and where applicable, reception staff at the facility, so that notice of disruption can be communicated by phone; and,
- Be prepared to provide notice of disruption in alternate formats upon request.

**A. Printed Notices**

Printed Notices shall be posted:

- In a conspicuous place;
- In multiple locations (where applicable);
- At a height that is visible from a seated position where pedestrian traffic is expected;
- In a size visible from an appropriate distance for pedestrian, vehicular, etc., traffic as appropriate; and,

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- Use appropriate City templates or specifications.

Strategic Communications supports with content development, design and printing of any materials that City divisions choose to display at their service counters. This could include forms, flyers, A-frame signage, posters, pop-up banners.

**B. Electronic Notices**

Electronic notices shall be posted:

- On the City's website;
- On the facility's, Division's, or Department's website, as applicable;
- On the "OurBrampton" portal;
- By email, as appropriate; and
- Use appropriate City templates or specifications.

**C. Telephone Notices**

Telephone notices shall be communicated:

- In automated telephone reception messages and voicemail greetings at the Corporate Call Centre, Divisional Call Centres, and facilities; and,
- By Call Centre staff and/or reception staff (i.e. staff responsible to answer public facing telephone numbers).

**D. Custom Notices**

In situations where City templates cannot be used, notices will meet the following specifications:

- Be written in plain language;
- Use sans serif font (i.e. Arial, Verdana, Calibri);
- Use Arabic numbers (i.e. do not use Roman numerals);
- Use upper- and lower-case letters (i.e. do not use all capital letters);
- Provide a strong colour contrast for the letters and background (i.e. black lettering on white background);
- Use graphic symbols or pictograms where possible (i.e. arrows for direction); and,



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- Limit the use of bold, underlining and italics.

### Accessibility Training

To build greater awareness of how to plan, support and accommodate individuals of all abilities, the City requires that all staff, volunteers, and 3rd-party agents complete the “Accessibility for Life” training. This is a required essential training as part of the *Accessibility for Ontarians with Disabilities Act* (AODA) and is aligned with Council’s priority of Brampton is a Mosaic. A record of training, including dates and the number of individuals trained, will be maintained, and evidence of completion of the training course is maintained in employee files.

Volunteers and Contractors will receive a PDF version of the training, and will be required to review and confirm knowledge and acceptance of the training on a Microsoft Form, that is accessible through a QR code, or by visiting [www.brampton.ca/AccessibilityTraining/](http://www.brampton.ca/AccessibilityTraining/). This information will be stored in SharePoint, and will be available only by the Accessibility Team. Training by volunteers for the Performing Arts facilities will be tracked in the Better Impact tracking software.

The City’s Accessibility training includes:

- The purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*, the requirements of the Customer Service Standards and the Ontario Human Rights Code as it pertains to individuals with disabilities
- How to interact and communicate with individuals with disabilities
- How to interact with individuals who use assistive devices or require the assistance of a service animal or a support person; and
- What to do if a person with a disability is having difficulty in accessing our organization’s goods, services, or facilities.

Training may be completed through a variety of means including but not limited to:

- Online training;
- Small class training (i.e. Parks Department, Community Service, Volunteers on advisory board, etc.);
- Management team presentations;
- New hire orientation (i.e. Transit); and/or,
- Independently reviewing a hardcopy of the training materials.



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### Feedback

Feedback may be provided in a variety of formats and methods of communication including in writing; by electronic text/email; by phone; or in person at any of the City's service locations. Feedback can also be provided using the **Accessibility Feedback Form** which is available on [www. Brampton.ca](http://www.Brampton.ca).

### Receiving Feedback

Feedback shall be received in a range of formats, including:

- By telephone;
- In person;
- In writing;
- In electronic format (i.e., online, text message, E-mail, portable memory device); and/or,
- Alternate formats and communication supports that meet the unique needs of the individual providing feedback.

### Documenting and Tracking Feedback

All feedback shall be documented in writing and tracked. Feedback forms are available online or by contacting the Accessibility Coordinator at [Accessibility@brampton.ca](mailto:Accessibility@brampton.ca).

Staff receiving feedback shall complete Feedback Forms (or receive Feedback Forms completed by customers) and send them electronically or by internal mail to the attention of the Accessibility Coordinator, office of the City Clerk. These can also be scanned and emailed to [Accessibility@brampton.ca](mailto:Accessibility@brampton.ca).

### Processing Feedback

The method of processing feedback may be unique to particular goods, services and facilities. Departments, divisions, and sections shall ensure an appropriate process for processing feedback is in place. In all circumstances, feedback will be:

#### A. Acknowledged

- Receipt of feedback shall be acknowledged within 1 business day.
- Acknowledgement of feedback shall: be provided in the same format in which the feedback was received (unless an alternate format has been requested) and include a thank you message.
- Depending on the nature of the feedback, no further action may be required. If further action is required, identify in the acknowledgement that there will be further contact within 5 business days.

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**B. Investigated, Actioned and Resolved**

- When investigation and/or further action are required, a follow-up communication shall be made within 5 business days. The follow-up communication must include details of how the issue has been resolved or the next steps towards resolution of the issue, which may include:
  - Actions to be taken such as referral to staff or management, investigation, costing, scheduling of repairs and modifications;
  - Expected timelines to resolution; and/or,
  - Details on further communications, where appropriate or required.

**Communicating the Feedback Process**

Information about the feedback process will be readily available to the public, including being posted on the City's Website and in City publications and brochures, and having printed copies available at service counters and information kiosks.

The City will provide accessible formats and communication supports when receiving and responding to feedback.

**Format of Documents**

- The City will use reasonable efforts to provide documents or information in a format that takes the person's disability into account;
- Accessible formats include large print, Braille, captioning on videos, recorded audio of electronic formats, and sign language;
- It is important to consult with customers and take into account their disability to determine the most suitable format or communication support needed; and,
- Accessible formats and communication supports are available upon request.

**Related Documents:**

Accessibility Feedback Form

Accessibility Policy

By-law 380-2003 (Commonly known as the User-Fee By-law)

Customer Service Standards

Inclusive Customer Service Resources Manual for Vendors

Inclusive Customer Service Policy

Owner Inclusive Customer Service Policy

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## Service Disruption Notices

**Accountability:**

Accessibility is a shared responsibility, and everyone has a part to play in making the City accessible to residents, visitors, and co-workers, as described in the following roles and responsibilities.

**All People Leaders/Managers**

- Ensure compliance with the Accessibility Policy;
- Ensure appropriate accessibility contract language is included in all agreements;
- Provide staff training on assistive devices unique or specific to the department (i.e. pool wheel chairs, transit ramps, etc.);
- Ensure assistive devices that are stored in the facility, are kept in good working order, and are readily available when requested;
- Ensure no additional fees are charged for support persons;
- Ensure notice of service disruptions are visibly posted in the facility, and will work with the Accessibility Team to ensure the posting is available on the website; and,
- Ensure all staff, volunteers and contractors have completed the Accessibility Training within 90 days of joining the City.

**Employees, Volunteers and Third Parties**

- Maintain compliance with this Policy;
- Be familiar with their rights and responsibilities under this Policy; and,
- Ensure individuals of all abilities are treated with dignity and respect in all interactions;
- Welcome service animals into City facilities;
- Engage support persons after obtaining consent from the individual with the disability; and,
- Receive, acknowledge, process and communicate feedback with individuals in a timely manner.

**Contacts:**

<b>Name</b>	<b>Role</b>	<b>Department/Area</b>	<b>Contact #</b>
Janice Adshead	Deputy Clerk	City Clerk's Office, Accessibility	905-874-2109
Shant Goswami	Accessibility Coordinator	City Clerk's Office, Accessibility	905-874-2184
Sylvia Ingham	Clerk, Access & Inclusion	City Clerk's Office, Accessibility	905-874-2110

**STANDARD OPERATING PROCEDURE**

Effective: July 7, 2021

Review Date: July 7, 2023

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**Director(s) Approval – Version Number X**

Director(s) name/Title	Dept	Date Approved	Signature
Peter Fay, City Clerk	Legislative Services	July 7, 2021	