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### 1.0 Purpose:

This policy and set of procedures have been created to meet the requirements of Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, and applies to the provision of providing goods and services to customers.

All goods and services provided by E. Hofmann shall follow the principles that respect the dignity, integration, equal opportunity, and independence of customers with disabilities. E. Hofmann is committed to giving customers with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

### 2.0 Scope:

This policy applies to the provision of goods and services at premises owned and operated by E. Hofmann Plastics Management, employees, agents and/or contractors who deal with customers or other third parties that act on behalf of E. Hofmann. This includes the provision of goods and services that occur both on and off the premises of E. Hofmann. This policy shall also apply to all persons who participate in the development of the E. Hofmann's policies, practices, and procedures governing the provision of goods and services to customers.

### 3.0 Definitions:

#### *Assistive Device-*

*is a technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of customers with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, scooter, walker, walking stick, communication board, speech generating device, white board, teletypewriter service, magnification devices, pen and paper, personal amplification device, hearing aid, or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering, and/or reading.*

#### *Disability-*

*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.

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

### *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.

### *Telephone services*

E. Hofmann is committed to providing fully accessible telephone service to our customers. As part of our training, staff are taught to communicate with customers over the telephone in clear and plain language and to speak clearly and seek confirmation for understanding.

E. Hofmann will offer to communicate with customers by e-mail or in a face-to face meeting, if telephone communication is not suitable to their communication needs.

### *Assistive devices*

E. Hofmann is committed to serving customers with disabilities who use assistive devices to obtain, use, or benefit from our goods and services. E. Hofmann Canada Inc. will ensure that our staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

### *Use of service animals and support persons*

Hofmann is committed to welcoming customers with disabilities who are accompanied by a service animal on our premises that are open to the public and other third parties unless otherwise excluded by law. E. Hofmann will also ensure that all staff, dealing with customers are properly trained on how to interact with customers with disabilities who are accompanied by a service animal or a support person. However, service animals are not permitted in our plant or warehouse under any condition.

## **4.0 Notice of Temporary Service Disruption**

E. Hofmann will provide customers with notice in the event of a planned or unexpected disruption in the

facility or services usually used by customers with disabilities. This notice will include information about the reason for disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Procedure if a customer is unhappy about a service disruption

- a) Apologize for the inconvenience
- b) Acknowledge their concerns
- c) Ask if they have an e-mail or another method that you could contact them in the future
- d) Ask them if they wish provide feedback verbally or by our feedback form.

Training:

An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard

E. Hofmann's Accessible Customer Service Plan related to the customer service standard

How to interact and communicate with customers with various types of disabilities

How to interact with customers with disabilities who use an assistive device or require the assistance of a service animal or a support person

What to do if a person with a disability is having difficulty in accessing E. Hofmann's goods and services

E. Hofmann's policies, practices and procedures relating to the customer service standard

*Disability Awareness training which can be accessed by using the following link  
<http://www.mcass.gov.on.ca/mcass/serve-ability/splash.html>*

All staff will also be trained/updated on an ongoing basis for changes that are made to these policies, practices, and procedures.

*Generally, how to interact with a customer with an assistive device*

- a) Never refuse to work with the device
- b) Do not stare or gawk at the device
- c) Provide appropriate amount of space
- d) Do not block, or bump into the assistive device
- e) Offer assistance if the customer is having trouble working with their device

*How to interact with customers with a wheelchair*

- a) Greet the person, wait, and follow the person's instructions and/or permission to assist the customer. Don't touch the wheelchair unless you have permission
- b) Confirm that the customer is ready to move
- c) Describe what you are going to do before you do it
- d) Try to avoid uneven ground and objects

- e) Don't leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors
- f) Respect the customer's personal space. Don't lean over them.

*Procedure if a customer is unhappy about a service disruption*

- a) Apologize for the inconvenience
- b) Acknowledge their concerns
- c) Ask if they have an e-mail or another method that you could contact them in the future
- d) Ask them if they wish provide feedback verbally or by our feedback form.

*How to interact with customers with a disability over the phone*

- a) Be patient and use active listening (stop what you are doing, listen to the tone and emotion behind the words, clarify you have understood and then summarize)
- b) Provide AODA or other documents if requested (ask what format they wish to receive it in. i.e., e-mail, larger print, etc....)
- c) Offer to send an e-mail of a customer feedback form that can be e-mailed to Human Resources or fill a form out with information you receive verbally.

The TTY is an assistive device for customers with hearing disabilities. E. Hofmann employees can communicate with a customer who uses a Relay Service but not directly with a TTY.

A customer with a TTY machine can call the Bell Relay Service and the Relay Service Operator will stand by on the phone and relay the communication between the person with the TTY machine and a person that does not have a TTY machine.

Be patient (relay systems will have a long pause between responses)

- a) Use active listening (stop what you are doing, listen to the tone and emotion behind the words, clarify you have understood and then summarize)
- b) Provide AODA or other documents if requested (ask what format they wish to receive it in. i.e., e-mail, larger print, the documents read to them etc....)
- c) Offer the customer the Customer Feedback Form to complete or take the information verbally and fill out the form for the customer

*How to interact with customers with a support animal*

- a) Remember that the service animal is not a pet, it is a working animal.
- b) Avoid making quick movements around the animal.

*How to interact with customers with a support person*

- a) Speak to the customer directly and not the support person.
- b) If you are not sure if the person is a support person or not, ask the customer.

### *How to interact with customers with vision disabilities*

- a) Use your everyday projection and volume when you speak. There is generally no need to raise your voice because the person does not necessarily have hearing loss. Say your name even if you know the person well as many voices sound similar.
- b) Move to a well-lit area if possible.
- c) Be clear and precise when giving directions, e.g., two steps behind you, a foot to your left, etc.
- d) Do not touch your customer without asking permission. Offer your elbow to guide the person. If he or she accepts when the person is ready, walk slowly, lead – do not pull.
- e) Again, do not touch or speak to service animals – they are working and must pay attention at all times.
- f) Do not leave your customer in the middle of a room. Show him or her to a chair or guide them to a comfortable location. If you need to leave your customer, let him or her know you are leaving, and you will be back.
- g) When providing printed information, offer to read or summarize it. Offer to describe information. For example, verbally itemize a bill or explain what the specials are or what are the choices of product they can order.

### *How to interact with customers with hearing disabilities*

- a) Move to a well quiet area if possible.
- b) Don't put your hands in front of your face when speaking. Some customers read lips. When speaking, check for understanding. (25% can read lips understanding 45-50% of what is being said)
- c) If necessary, ask if another method of communicating would be easier, for example, using a pen and paper.
- d) Be patient if you are using a pen and paper to communicate. American Sign Language may be your customer's first language.
- e) Reduce the background noise if possible or move into a different area.

### *How to interact with customers that are deafblind*

- a) Customers who are deafblind will generally have an intervener (a professional who can communicate with them). If not they will explain to you how to communicate with them, in some cases, with the use of a sign or card.
- b) Do not speak directly to the intervener. Direct your attention to the customer like you normally would.

### *How to interact with customers with physical disabilities*

- a) Speak naturally and directly to your customer, not to his or her companion or support person.
- b) Ask before you help. Customers with physical disabilities often have their own ways of doing things. Wait for and follow the person's instructions

- c) Respect your customer's personal space. Do not lean over him or her or on his or her assistive device. Don't touch assistive devices without permission. If you have permission to move a person in a wheelchair, remember to confirm that your customer is ready to move and describe what you're going to do before you do it. Don't move items or equipment, such as canes and walkers, out of the person's reach.
- d) Don't leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors
- e) If you need to have a lengthy conversation with customers in a wheelchair or scooter, consider sitting so that you can make eye contact.

#### *How to interact with customers with intellectual/developmental disabilities*

- a) Don't assume what a person can or cannot do. Do not raise your voice or slow your speed down.
- b) Use plain language and speak in short sentences. Provide one piece of information at a time.
- c) To confirm if your customer understands what you have said, consider asking the person to repeat the message back to you in his or her own words.
- d) If you cannot understand what is being said, simply ask again.
- e) Be supportive and patient.
- f) Speak directly to your customer, not to their support person or animal.

#### *How to interact with customers with learning disabilities*

- a) If you know the customer has a learning disability, ask how you can help.
- b) Speak naturally, clearly, and directly to your customer.
- c) Allow extra time if necessary. Customers with learning disabilities may take a little longer to understand and respond. Be patient and be willing to explain something again, if needed.

#### *How to interact with customers with mental health disabilities*

- a) Treat a person with a mental health disability with the same respect and consideration you have for everyone else.
- b) Be patient.
- c) Do not raise your voice or slow your speed down.
- d) Be confident and reassuring. Listen carefully and work with your customer to try to meet their needs. Customers' reactions may not be connected to you personally.
- e) If a customer appears to be in a crisis, ask him or her to tell you the best way to help.
- f) Break up lengthy conversations into a series of shorter ones and do not speak too quickly to prevent confusion and anxiety (speak naturally)

### *How to interact with customers with speech or language disabilities*

- a) Don't assume that because a person has one disability, they also have another. For example, if a customer has difficulty speaking, it doesn't mean they have an intellectual or developmental disability as well.
- b) Ask your customer to repeat the information if you don't understand.
- c) Ask questions that can be answered "yes" or "no" if possible.
- d) Try to allow enough time to communicate with your customer as they may speak more slowly than normal.
- e) Don't interrupt or finish your customer's sentences. Wait for them to finish.

## **5.0 Continuous Improvement**

Any employee that feels that any part of the goods and services provided by E. Hofmann does not comply with the principles: dignity, integration, equal opportunity, and independence of customers with disabilities and/or this policy and procedures are also encouraged to immediately report this information to Human Resources. Feedback regarding the way E. Hofmann provides goods and services to customers with disabilities can be made in person, by telephone, in writing, or by delivering an electronic text by e-mail or feedback form. All feedback information will be collected on a Customer Service Feedback Form, and which gets directed to the Human Resources and Executive group who reviews the information. Human Resources will respond to the feedback to appropriate manager, who will then respond back to the feedback. Every effort will be made to respond to the feedback within 48 hours on receipt of a complaint. In some circumstances some requests may take one to two weeks to respond.

## **6.0 Verbal feedback**

- a) Use the customer feedback form to take notes
- b) Stay calm and don't get defensive
- c) Ask the customer to confirm the notes captured on the form
- d) Advise if the customer that you will be submitting the form to Human Resources

## **7.0 Training:**

E. Hofmann will provide training on this policy, practices, procedures, and employment standards under the Integrated Regulation, and the Human Rights Code as it pertains to the duty accommodate all employees with disabilities.

Training will be provided to:

- a) Front Line Employees
- b) those responsible in the development of policies, and procedures.
- c) all other persons who provide goods, services, or facilities on E. Hofmann behalf.

### 8.0 Policy Revisions:

E. Hofmann is committed to developing employment policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on applicants, prospective employees, and employees with disabilities.

This policy is available in an alternative format upon request.

### 9.0 Document Control:

E. Hofmann will maintain accurate records of training delivered to staff and make these records available for inspection as may be required.

Where any applicable law conflicts with the provisions of this policy, the policy will be deemed amended as necessary to comply with the law while preserving the principles and intent of the policy.

### 10.0 Regulations, Guidelines and References

*Accessibility for Ontarians with Disabilities Act, 2005*  
*Ontario Human Rights Code*  
*Integrated Accessibility Standard Regulation (O.Reg.191/11)*  
*Multi-year accessibility plans*  
*Workplace emergency response information*  
*Employment standards act*

### 11.0 Distribution

Executive  
Management  
Human Resources  
Customer Service  
Employees/Operators