

Strong Start® Charitable Organization Accessible Customer Service Policy

Strong Start® Charitable Organization is committed to excellence while serving our customers; complying with all applicable national and regional laws pertaining to non-discrimination and equal opportunity.

Strong Start understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Strong Start is committed to complying with both the Ontario Human Rights Code and the AODA.

This policy applies to all Strong Start employees, volunteers* and contract workers in Ontario, regardless of where they are located, as well as other entities who interact with the public on behalf of or in collaboration with Strong Start programs.

Our Accessible Customer Service Policy is consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities.

*For volunteers in the role of a Volunteer Coach and/or Site Co-ordinator in Strong Start's *Letters, Sounds and Words*™ program, all accessibility requirements and any training related to their role will be the responsibility of the school running the program.

Assistive Devices

People with disabilities may use their personal assistive devices when at the Strong Start Provincial Office and at any of our program partner sites.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, additional measures will be used to ensure the person with a disability can access our goods and services or facilities.



We will ensure that our employees are trained and familiar with any assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods and services or facilities.

Strong Start employees and/or volunteers who are working outside of the Provincial Office, will be trained based on the required assistive devices needed to support our programing. This includes training, in collaboration with our program partner sites, where applicable to the employee and/or volunteer's* role and location of work.

Communication

Strong Start will communicate with people with disabilities in ways that take into account their disability.

This may include the following:

- Email and/or Text messaging
- Telephone, including TTY (Telephone Relay Service) and VRS (Video Relay Service)
- Text documentation
- Electronic signing options (e.g., DocuSign)
- Video calls (e.g., Zoom/Teams)
- Closed Captioning and/or Live Transcripts

We will work with the person with a disability to determine what method of communication works for them – at no additional cost to them.

If we are not able to meet the person's particular requirement in a reasonable timeframe, we will inform them and will work with them to determine an alternate method or will provide a summary of the information.

Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.



When we cannot easily identify that an animal is a service animal, an employee 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 Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses 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

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods and services or facilities:

- Explain why the animal is excluded
- Discuss with the customer another way of providing use of the goods and services or facilities

Animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale, as per: Ontario Regulation 562, under the Health Protection and Promotion Act.

Special Note: Strong Start programs take place in varying locations. If a service animal is needed by an employee, volunteer* or customer at one of our program locations, the AODA Committee, along with the Program Co-ordinator in the region the request was made, will review the request and responsibility of AODA at the applicable location(s).



Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them at the Strong Start Provincial Office.

All support persons will be required, where applicable, to attend an orientation to the office and comply with all Health and Safety rules, regulations, and protocols.

In certain cases, Strong Start might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- The person with a disability
- Others on the premises

Before making a decision, Strong Start will:

- Consult with the person with a disability to understand their needs
- Consider health or safety reasons based on available evidence
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

Special Note: Strong Start programs are often held at sites and locations outside of our Provincial Office. If a Support Person is required for a person within our programs, we commit to working collaboratively with our Program Partners and Program Coordinators, to ensure the best outcome for all concerned.

Notice of Temporary Disruption

Strong Start will promptly notify persons with disabilities, in the event of a planned or unexpected disruption to goods and services or facilities for people with disabilities in Ontario. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Services/Facilities at the Strong Start Provincial Office include:

- Accessible Washroom
- Automatic entry and exit doors



- Accessible Parking
- Entrances into building
- Service Counter

The notice will be made publicly available in the following ways:

- Strong Start website, where applicable
- Email, text, or phone communication with the affected person
- Signage and/or Posters

Special Note: For Strong Start programs held at a location outside of our Provincial Office, any disruption of service will be communicated with the employee and/or volunteer* affected through a pre-determined form of communication (e.g., email, text, phone, social media, etc.). In some cases, Strong Start may not be made aware of a disruption of service at a program partner location, however, we commit to working collaboratively with our program partners to ensure that any disruption is known and communicated as quickly as possible.

Training

Strong Start is committed to excellence and building positive relationships with our customers. As a result, we will provide accessible customer service training to:

- All employees and volunteers*
- Anyone involved in developing our policies
- Anyone who provides goods and services to customers on our behalf

Staff will be trained on accessible customer service within 30-days after being hired, or as required for their role and location of work.

Training components will be based on the employee and/or volunteer* role; location(s) of work and reviewed annually and updated as required.

Training will include:

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



- Strong Start's policies related to the customer service standard
- How to interact and communicate with people with various types of disabilities
- 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 the equipment or devices available on-site or otherwise that may help with providing goods and services or facilities to people with disabilities
- What to do if a person with a disability is having difficulty in accessing Strong Start's goods and services or facilities
- How to complete an Individual Accommodation Plan

Training will be completed as required, based on the employee and/or volunteer's* role and location of work.

Employees and/or volunteers* will also be trained when changes are made to our Accessible Customer Service policies, at any time throughout the calendar year.

Feedback Process

Strong Start welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Customers who wish to provide feedback on the way Strong Start provides goods and services or facilities to people with disabilities can provide feedback in the following ways:

- In person: 1-565 Kumpf Drive, Waterloo, ON N2V 1K3
- Email: <u>accessibility@strongstart.ca</u>
- Phone: 519-743-9578 ext. 102, including use of TTY or VRS
- In writing: 1-565 Kumpf Drive, Waterloo, ON N2V 1K3
- Electronically: <u>Accessibility Customer Feedback Form</u>
- By any other communication technology as required

All feedback, including concerns, will be handled in the following manner:

- Feedback will be directed to a person within Strong Start's Senior Leadership Team, based on the nature of the feedback and follow-up action required.
- Customers can expect to hear back in 2 business days.



Strong Start will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Notice of Availability of Documents

Strong Start will notify the public that documents related to accessible customer service, are available upon request by posting a notice in the following location(s)/way(s):

Website: https://www.strongstart.ca/

Strong Start will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

Modifications to this or Other Policies

Any policies of Strong Start that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed.

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Approved by Executive Director, June 30, 2021.

Approved by Strong Start Board, October 5, 2021.