

Policy Summary:

This policy describes how Rho-Can Machine & Tool Co. Ltd. is committed to ensuring accessible and equitable customer service to each and every client and to provide it in a manner that respects the dignity, independence and integration of persons with disabilities. This Accessibility Plan and these respective policies are intended to meet the compliance requirements of the Accessibility for Ontarians with Disabilities Act (AODA) 2005 and the Customer Service Standard 429/07.

Purpose:

This Accessibility Plan outlines Rho-Can Machine & Tool Co. Ltd. obligation and commitment in the provision of equal access to goods and/or services to persons with disabilities in the following areas;

- communicating effectively with a person with a disability;
- the use of personal assistive devices;
- the use of service animals and support persons by persons with disabilities;
- notice of temporary disruptions in services and facilities;
- training requirements and content;
- customer feedback mechanism regarding the provision of goods and/or services to persons with disabilities;
- the notice of availability and format of documents available to the public.

Scope: This policy and procedure applies to our stakeholders as follows:

- All people who access our goods, services, and events
- All staff, volunteers, students, contractors, consultants, third parties and others working on behalf of Rho-Can Machine & Tool Co. Ltd. and who interact with the public or provide goods or services to our clients/customers
- Staff, board members, and others who are involved in developing policies and procedures regarding the accessibility standards
- People who accompany clients with disabilities who use our services

Definitions:**“Accessible Formats”**

May include but are not limited to large print, recorded audio and electronic formats, braille and other formats used by persons with disabilities

(Accessibility) “Standard”

A “standard” explains an accepted way of doing something. It states what the requirements are, who must meet them, and by when.

“Admission Fee”

The fee charged for attending events or obtaining services.

“Alternative Ways”

Providing different ways of helping clients, consumers, or visitors with disabilities to access our premises or services when they are unable to use their own assistive devices. Alternative ways must consider the principles defined in this policy. Examples of alternative ways are:

- A staff person providing assistance when a personal assistive device cannot be used
- Writing information clearly and simply if electrical equipment causes static in a person’s hearing aid
- Asking how best to assist the person
- Allowing the client, consumer, or visitor to suggest alternate ways of being assisted and accepting suggestions within our ability.

“Assistive Devices”

“Assistive devices” means technical aids, communication devices, or medical aids modified or customized that are used to increase, maintain, or improve how a person with a disability can function.

An assistive device may be as simple as a pen and paper used to assist a person to communicate. Other examples may include, but are not limited to, wheelchairs, walkers, white canes (used by people who are blind or have low vision), note taking devices, portable magnifiers, recording machines, assistive listening devices, personal oxygen tanks and devices for grasping.

“Assistive Communications Devices/Supports”

Can be software or aids that are used to help people with a disability communicate. Examples of assistive communication devices may include but are not limited to: plain language, sign language, alternative and augmentative communication supports, text readers, amplifiers, screen magnifiers, captioning and interpretation.

“Barrier”

Can be anything or obstacle that prevents a person with a disability from fully participating in all parts of society due to their disability, including a physical barrier, an attitudinal barrier, an architectural barrier, an information or communication barrier, a technological barrier, or a systemic barrier – (a policy or practice barrier)

“Communication”

A process of providing, sending, receiving, and understanding information. Communication is a two-way exchange. Examples of methods of communications are but not limited to: spoken, written, graphic, symbolic, electronic and sign language

“Compliance”

Fulfilling the requirements of the standard

“Disability”

Any degree of impairment, injury, illness or malformation;
Can be born with it, or acquire it from a disease, illness or an accident (WSIB or other);
Can be visible or invisible;
Can be a temporary, intermittent or permanent condition;
Can be a reliance on a guide dog or other service animal;
Can be a reliance on a mobility device (cane, walker or wheelchair) or other remedial appliance or device

Can be any combination of:

- A sensory impairment such as hearing loss, vision loss or speech impairment;
- Any degree of physical disability, infirmity, malformation or disfigurement;
- An intellectual impairment or a developmental disability;
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder;
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

“Guide Dog”

This is a dog that has successfully completed the training program at any of the facilities listed in the Blind Person’s Rights Act and has been qualified as a guide dog.

“Notice”

A notice is an announcement, warning, or information of something pending or that has occurred. A notice may be posted in various ways for example - internet/website, phone, sign, and newsletter.

“Principles”

As defined in the standard, requires service providers to use reasonable efforts to ensure policies, procedures, and practices are consistent with:

- Respecting the dignity and independence of people with disabilities
- Providing services to people with disabilities that are integrated with the services provided to people unless an alternative measure is required
- Giving equal opportunity to people with disabilities to obtain, use and benefit from our services.

“Regulation”

Rules, guidelines, and instructions

“Service Animal”

Service animals may also be called “assistance animals”, “assist animals”, “support animals” or “helper animals”. An animal is a service animal (not restricted to dogs) 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 a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability

“Support Person”

May also be called “support professional”, “caregiver”, “interpreter” to name a few. A support person is a person who assists an individual with a disability to lead a self-directed life and who accompanies him/her to help with communication, mobility, personal care, medical needs or to assist with access to goods or services. This may be a professional, a relative, a volunteer, or friend or a paid employee.

“Temporary Service Disruption”

This is a planned or an unexpected event that may affect access to a good or service. An example of a temporary planned disruption is a scheduled repair planned for the ramp to access your facility. A power outage due to a storm would be an emergency or unplanned temporary disruption.

Providing Goods and Services to Persons With Disabilities

Rho-Can Machine & Tool Co. Ltd. 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/clients receive the same value and quality;
- Allowing persons with disabilities to do things in their own ways, at their own pace when accessing goods and/or services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that persons 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/or services;
- Communicating in a manner that takes into account the person's disability;
- Welcoming people accompanied by guide dogs, service animals or support people and providing information about access;
- Providing clear, complete, timely and prominent notice of temporary disruption of any of our services used by people with disabilities;
- Ensuring that our board and senior management who approve policies receive training on AODA legislation;
- Providing timely and ongoing training to our staff, students and volunteers who deal with clients, to ensure their understanding of and ability to implement our policies regarding service to people with disabilities;
- Implementing and communicating our processes for receiving and responding to feedback and handling complaints about how we provide services to people with disabilities and
- Complying with documentation standards, including availability and format of documents.

Communication Policy:

Rho-Can Machine & Tool Co. Ltd. is committed to effectively communicating with people with disabilities. We do this by:

- Considering the individual needs of the person with the disability when communicating with them
- Educating staff, students, volunteers, and others about providing effective ways of communicating with people with disabilities
- Using appropriate language when referring to people with disabilities and taking action when unacceptable terms are used
- Soliciting feedback about our communications from clients, consumers, experts, and others
- Keeping current with communication technology and standards for people with disabilities.

Rho-Can Machine & Tool Co. Ltd. will develop and enforce communication criteria that provide a range of options to make all communication more accessible to people with disabilities.

- Adopting current best practices whenever possible
- Educating staff, students, and volunteers about best methods to use when communicating with individuals having disabilities being sensitive to their individual needs or requirements.

Rho-Can Machine & Tool Co. Ltd. will communicate to persons with disabilities in ways that consider their disability. We will train our staff, students, and associates on how to interact and communicate with persons with various types of disabilities.

Communication - Telephone Services

Rho-Can Machine & Tool Co. Ltd. is committed to providing fully accessible telephone service to all customers. We will train our staff and associates to communicate with our clients/customers over the telephone in plain language while speaking clearly and slowly. We will also make our staff and associates familiar with technologies intended for persons with disabilities.

Print Material, Billing/Invoices

Rho-Can Machine & Tool Co. Ltd. is committed to providing accessible billing/invoices to all our clients/customers and our third-party business partners. Rho-Can Machine & Tool Co. Ltd. will answer any questions clients/customers may have about the content of the billing and will be responsible for ensuring that the alternative formats are available upon request as required.

Assistive Devices Policy:

Rho-Can Machine & Tool Co. Ltd. is committed to ensuring clients with disabilities who access our services and anyone with a disability who visits our site will be able to use their assistive devices within the limits of any applicable privacy, health and safety laws or regulations. We will do this by:

- Using reasonable efforts to ensure clients, consumers and visitors with disabilities and who use assistive devices are treated with dignity, independence, and equality of opportunity
- Educating staff about various personal assistive devices, train staff regarding the use of any facility assistive devices, equipment and/or technology
- Allow clients, consumers and people with disabilities who use our services or visit our site to use their personal assistive devices

Limitations:

This policy does not cover devices that are used by people without disabilities or devices that are not related to a disability.

Use Of Service Animals & Support Persons Policy:

Rho-Can Machine & Tool Co. Ltd. is committed to allowing full access to our goods, services and to our premises to people with disabilities and their service animals wherever possible. We will do this by:

- Allowing full access to areas of the premises open to the public or to other third parties
- Ensuring the person with a disability has access to their service animal at all times
- Educating staff, volunteers, students, and others dealing with the public about the use of service animals.
- Providing training to staff, volunteers, students and others dealing with the public on how to interact appropriately with people with disabilities who are accompanied by a service animal.

- Assisting people with disabilities who are accompanied by a service animal when they request help with their animal if it is safe and reasonable to do so.
- Ensuring health regulations concerning service animals are posted.
- Providing other measures to access our services for people with disabilities if their service animal is excluded by law from certain areas of our premises
- Use reasonable effort to provide alternative means of accessing goods or service delivery if the health or safety of another person (staff or client/customer) presents itself as a result of the presence of a service animal

Limitations:

The person with a disability must always keep the service animal under care and control while on the premises.

Support Person:

Rho-Can Machine & Tool Co. Ltd. is committed to allowing full access to our services and premises to people with disabilities and their support persons. We will do this by:

1. Allowing full access to our premises to people with disabilities and their support persons unless that area of the organization is not open to the public or other third parties or it is unsafe to do so.
2. Ensure the person with a disability and his/her support person can enter our premises together and that the person with a disability always has access to his/her support person while on the premises.
3. Understanding that the decision to have the support person accompany the client into the service area is at the discretion of the client. When clients access services and programs and request that their support person accompany them into the service area, it is implied that the client has provided consent and that the client's support person understands and commits to the confidentiality of the client's personal health information. Consent will be obtained from the person with a disability prior to any conversation where confidential matters are discussed
4. Educating and training staff, volunteers, students, and others who provide service to the public about the role of support persons for those with a disability and the accommodations for accessing goods, services, and premises.
5. Including in our publications and website where appropriate that we welcome people who are accompanied by support persons.

6. Giving advance notice about the admission fee (if applicable) that will be charged for support persons who accompany people with disabilities to events or services sponsored by Rho-Can Machine & Tool Co. Ltd.. We will ensure that signage and template for events provide details about admission costs for support people are available and written and displayed prominently.

Limitations:

A support person must remain with the person with a disability and adhere to the rules and principals of the service organization while on the premises.

Notice OF Temporary Service Disruption Policy:

Where required by law, during a temporary disruption in services, Rho-Can Machine & Tool Co. Ltd. will make a reasonable effort to provide clients/customers with notice of the reason for the disruption and its anticipated duration. Notices will be posted at the point of disruption, at the main entrance and at the nearest accessible entrance as soon as possible. Service disruptions may occur due to unforeseen circumstances. Notification for an emergency disruption will occur as soon as possible to avoid any unnecessary inconvenience to our clients or the public.

Procedure:

1. In the event of a temporary emergency disruption, all scheduled clients/members of the public or third party associates will be notified however, extra effort will be made to contact those persons with known accessibility issues that may rely on accessible transportation so alternative arrangements can be made.
2. An announcement will be posted on our answering service and at our entrance in all other emergency circumstances.
3. Any planned temporary disruption of services will have a notice posted in advance on our answering service as well as being posted in our reception area, billing area, and at our entrances.
4. All notices (planned and emergency) will contain the following information
 - Reason for the disruption
 - Expected duration of the disruption
 - Any alternative means of accessing goods or services during the disruption
 - If alternate facilities and/or services are available during the disruption we will also include this information in the posted notice

Training Policy:

Where required by law, Rho-Can Machine & Tool Co. Ltd. will provide training for all associates on the Accessible Customer Service Standards for persons with disabilities. This includes all required staff, associates and third party business partners contracted by Rho-Can Machine & Tool Co. Ltd. engaging with our clients/customers on our behalf. In addition, everyone who is involved in policies and standard operating practices and procedures will also be trained. Training records for staff will be maintained on site. Training updates with respect to legislative changes or any changes to the policies, practices, or procedures surrounding accessibility for persons with disabilities will be provided on an ongoing basis. Training will be provided within the first week of employment.

Training will include:

- Purposes of the Accessibility for Ontarians with Disabilities Act (AODA) 2005 and requirements of the Customer Service Standard 429/07
- Policies, practices, and procedures pertaining to providing accessible customer service to persons with disabilities
- How to interact and communicate with persons with various types of disability in a manner that considers his or her disability
- 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 equipment or devices available that may help with the provisions of goods and/or services
- What to do if a person with a particular type of disability is having difficulty accessing goods and/or services

Customer Feedback Process Policy:

Rho-Can Machine & Tool Co. Ltd. has established a feedback process specifically for the accessibility of our clients with disabilities. The ultimate goal of Rho-Can Machine & Tool Co. Ltd. is to provide a great customer experience while serving persons with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated as we plan and make future improvements to our customer service practices. A Customer Feedback process is in place to collect and respond to comments and concerns from persons with disabilities. All feedback is welcome and appreciated as we plan and make future improvements to our customer service practices.

Our procedures further outline the responsibilities of our staff and the rights of our clients in relation to customer feedback including; posting a Customer Feedback Notice; a process for gathering feedback; an action plan to resolve identified issues; and a timeline for responding to the complaint.

If requested, a copy of our Customer Feedback policy will be provided a copy in an alternative format considering the person's disability. If the format requested is unable to be accommodated, a mutually agreeable format will be provided in a timely fashion.

Feedback can be provided through any of the following channels:

- In person
 - By phone: 519 451-9100
 - By fax: 519 451-6620
 - By e-mail: engineering@rhocan.com
 - Other electronic forms: memory stick, compact disc
- By mail: 770 Industrial Road, London, Ontario, N5V 3N7

Procedure:

All staff will read and sign that they have received training on the Customer Feedback Policy

1. Rho-Can Machine & Tool Co. Ltd. will post a notice of our Customer Feedback Process on - Website, in the Reception Area/waiting room, Customer Service Counter
The notice will include the following information
 - The ability to provide feedback in a variety of ways - in person, by phone, fax, e-mail or letter/mail.
 - The ability to request copies of the Accessible Customer Service policies and procedures.
2. Staff will inform any customer with a disability that if needed, they are able to assist them whether that be to read the feedback form to them, assist in filling out the form or provide the form in an alternative format.
3. All feedback received through any medium (in person, by phone, fax or email) will be recorded on the **Customer Feedback Form** and forwarded to Manager of Human Resources.
4. A response to the customer providing the feedback will be generated within Five (5) business days. The response will be provided in a suitable format taking into consideration the client's disability.

5. A copy of the Feedback Policy and Procedure will be made available upon request to any person that requests it. The policies and procedures will be provided in a format that takes into consideration the person's disability. If the format requested is unable to be accommodated, a mutually agreeable format will be provided within Twenty (20) business days.
6. Copies of the Feedback Form will be available on the website, at the reception desk.

Notification Of Documents Policy:

Rho-Can Machine & Tool Co. Ltd. is committed to providing accessible customer service and will ensure that the public is notified that documents related to the Accessibility Standards for Customer Service are available upon request and will be provided in formats that take into account the person's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Rho-Can Machine & Tool Co. Ltd., our website and/or any other reasonable method.

Procedure:

1. Notify Public on website, brochure, publication/newsletter, poster or through other medium that Accessible Customer Services Policies and Procedure are available upon request.
2. Provide documents in an alternative format upon request taking into account the person's disability.
3. If unable to provide in requested format, provide in a mutually agreeable format.
4. If alternative format is requested, they will be provided in a reasonable time frame.

Where Required by Law (all designated public sector organizations regardless of size and all businesses with greater than 20 employees)

- Prepare and Make Available Documents Detailing our Policies and Procedures as set out in the Standard
- provide a record of training which will include content of training, dates training was provided, and a list of staff trained
- submit online reporting in the specified time lines.

Modifications to this or other Policies

Rho-Can Machine & Tool Co. Ltd. is committed to developing customer service 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 people with disabilities.

Any policy that does not respect and promote the dignity and independence of people with disabilities will be modified or removed. This policy and its related procedures will be reviewed as required in the event of legislative changes.

Questions about this Policy

This policy exists to provide a framework through which Rho-Can Machine & Tool Co. Ltd. can achieve service excellence to customers with disabilities. If anyone has a question about this policy, or if the purpose of any policy regarding accessible customer service is not understood, please contact: Management, email engineering@rhocan.com, phone 519 451-9100, or fax 519 451-6620

Read Confirmation:

It is mandatory that this and all related accessible customer service policies and procedures be read and signed by each employee or associate as identified within the scope of this policy.

References/Related Documents

Control #	Document Name	Document Type
	Accessibility for Ontarians with Disabilities Act, 2005	
	Blind Person's Rights Act: Regulation 58 Guide Dogs Act, 1990	
	Building Code Act, 1997	
	Canadian Charter of Rights and Freedoms, 1982	
	Corporations Tax Act/ Income Tax Act, 1990	
	Customer Service Standard Act, Ontario Regulation 429/07: 2008	
	Education Act, 1990	
	Health Protection and Promotion Act: Regulation 562, 1990	
	Human Rights Code of Ontario, 1990	
	Ontario Disability Support Program Act, 1997	
	Workplace Safety and insurance Act, 1997	

Revision History

Date	Rev Level	Description Of Change	Prepared By	Approval
2017-04-01	0	Creation	NH	DD
2022-04-17	0	Review, no changes made.	NH	DD

Original is saved in the SharePoint folder with read only access to all employees. If printed, employees are responsible for checking the network for the latest revision.