

<b>STATEMENT of POLICY and PROCEDURE</b>			
Manual:	Accessibility Standards	SPP No.	<b>AS 2.01A</b>
Section:	Customer Service	Issued/ Re-issued:	Dec. 4, 2017
Subject:	<b>Customer service policy on providing goods and service to people with disabilities</b>	Effective:	January 1, 2012
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Issued by:	First Reference Inc.	Dated:	Dec. 4, 2016

## 1 POLICY

1.01 The mission of First Reference Inc. is to provide Canadian organizations of any size with compliance based information in the areas of human resources and employment law and establish robust internal controls in the areas of accounting and finance, corporate governance, information technology and operations and marketing.

1.02 Our commitment in fulfilling our mission is to strive at all times to provide our goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people 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. Our commitment includes meeting the obligations of the Ontario **Human Rights Code** regarding non-discrimination. First Reference is committed to complying with both the Ontario **Human Rights Code** and the **Accessibility for Ontarians with Disabilities Act**.

1.03 Reasonable efforts will be made to ensure that:

- a) Persons with disabilities are provided equal opportunity to obtain, use and benefit from First Reference Inc goods and services as defined within the law; Please note that the standard does not set accessibility requirements for the goods themselves, but rather the way that they are provided to customers. In other words, it is the provision of goods or services to the public or other third parties (i.e., customers) that must comply with the customer service standard.
- b) Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- c) The goods and services provided to persons with disabilities are integrated with the provision to others unless an alternative measure is necessary to allow a person with a disability to benefit; the alternative measure may be temporary or permanent;
- d) Communications with a person with a disability are conducted in a manner that takes the person's disability into account;

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- e) Persons with disabilities may use his or her assistive devices, service animals and support persons as is necessary to access First Reference Inc. goods and services unless superseded by other legislation.

## **2 PURPOSE**

- 2.01 This policy and its procedures address the accessibility requirements of Regulation 191/11 Integrated Accessibility Standards under the **Accessibility for Ontarians with Disabilities Act**.

## **3 SCOPE**

- 3.01 This policy applies to all employees and customers in all facilities of First Reference Inc. in Ontario.

## **4 RESPONSIBILITY**

- 4.01 It is the responsibility of the managers and/or immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.02 Each manager and/or immediate supervisor and/or department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service under the Integrated Accessibility Standards Regulation and this policy.

## **5 DEFINITIONS**

- 5.01 **“Assistive Devices”** are auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).
- 5.02 **“Disability”**, as per the Ontario **Human Rights Code**, means:
- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness

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and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, 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**.

5.03 **"Employees"** means every person who deals with members of the public or other third parties on behalf of First Reference Inc, whether the person does so as an employee, agent, volunteer or otherwise.

5.04 **"Persons with Disabilities"** are individuals who have a disability as defined under the Ontario **Human Rights Code** (and above).

5.05 **"Service Animals"** are animals individually trained to do work or perform tasks for the benefit of a person with a disability.

5.06 **"Support Persons"** are any persons, whether a paid professional, volunteer, family member, or friend, who accompany a person with a disability in order to help with communications, personal care or medical needs, or with access to goods or services.

5.07 **"Customers"** mean members of the public, suppliers, subscribers, trial users, vendors, other businesses, consultants, providers of other business and professional services, the government or other organizations.

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## **6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE**

- **Accessibility for Ontarians with Disabilities Act, 2005**
- **Integrated Accessibility Standards, Ont. Reg. 191/11**
- **Ontario Human Rights Code, R.S.O. 1990, c.H.19**

## **7 PROCEDURES**

While providing goods, services and facilities to people with disabilities, First Reference is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

### **7.01 Communication**

- a) We will communicate with people with disabilities in ways that take into account their disability.
- b) We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

### **7.02 Telephone services**

- a) We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.
- b) We will offer to communicate with customers by email if telephone communication is not suitable to their communication needs or is not available.

### **7.03 Assistive devices**

- a) We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will

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ensure that our staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

- b) First Reference will not have any assistive devices available on the premises.

#### 7.04 **Billing and other business related documents**

- a) We are committed to providing accessible invoices and other business related documents to all of our customers. For this reason, invoices will be provided in the following formats upon request: In large print or text file, or by email or hard copy invoices.
- b) We will answer any questions customers may have about the content of the invoice or other business related documents by telephone or email.

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

- a) We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties.
- b) We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.
- c) We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter First Reference Inc's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

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- d) Fees will not be charged for support persons for admission to First Reference Inc. conferences or seminars. Customers will be informed of this by a notice that will be published in conference/seminar marketing materials and on the website.

#### 7.05 **Notice of temporary disruption**

a) First Reference will provide customers with notice in the event of a planned disruption in the facilities or services or services usually used by people with disabilities. The notice will include information about the reason for the disruption, its anticipated duration and a description of alternative services if available.

b) This notice will be placed at all public entrances on First Reference premises and will be noted in the telephone message for any callers, and posted on the website under the Accessibility Link.

#### 7.07 **Training for staff**

a) First Reference Inc will provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies. Individuals in the following positions will be trained:

Customer service staff; shipping staff; inside and outside sales staff; technical support staff; managerial staff who deal with customers; and editorial staff who interact with customers in person, by email or over the phone.

b) This training will be provided as soon as practicable after the employee commences his or her duties.

c) Training will include the following:

- The purposes of the **Accessibility for Ontarians with Disabilities Act** and the requirements of the customer service

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Standard under the Integrated Regulation; and how they relate to the Ontario **Human Rights Code**

- 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
  - What to do if a person with a disability is having difficulty in accessing First Reference Inc's goods and services
- d) Applicable staff will be trained on policies that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies.

#### 7.08 **Feedback process**

a) The ultimate goal of First Reference Inc is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

b) Feedback regarding the way First Reference Inc provides goods and services to people with disabilities can be made by email, letter or phone call. All feedback will be directed to the **Customer Service Manager** who is the person responsible for receiving feedback. Customers can expect to hear back within 48 hours.

c) Complaints will be addressed according to complaint categories already established in our company's complaint management procedures.

d) Upon receipt, the **Customer Service Manager** will investigate the matter with the appropriate personnel and provide a written response within thirty (30) days.

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#### 7.09 Modifications to this or other policies

- a) First Reference 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.
- b) Any policy of First Reference that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.
- c) First Reference will try to review the success of the policy as needed.
- d) Policies governing how the organization is committed to providing accessible customer service will be reviewed at least annually or when there are changes in the law or to procedures, or when an incident or breach occurs.

#### 7.10 Questions about this policy:

- a) This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to the **Customer Service Manager** at First Reference Inc.
- b) A copy of this policy is available upon request by contacting the **Customer Service Manager**. In addition, a copy of this policy is available on the company's website at <http://www.firstreference.com/accessibility.aspx> or under **Company** on the website.
- c) After consulting the person who made the request, the policy document will be provided in a timely manner and in a format that takes into account the person's disability.

#### 8. Record keeping



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First Reference will maintain accurate records of training delivered to our staff and volunteers and make these records available for inspection as may be required.