



## **Epilepsy Toronto**

### **Accessibility Plan, Policies & Procedures for Customer Service**

*Over the past 50 years, Epilepsy Toronto has been the place where Torontonians living with epilepsy can learn more about their condition, get the help they need and be a part of a family of caring and supporting people. Epilepsy Toronto prioritizes individual needs, the importance of living as independently as possible and the benefits of community engagement. Our programs and services address all aspects of epilepsy from the first diagnosis of a child, to the struggles that young people face, to adult needs such as employment and relationships.*

*Our programs are created and delivered with the principles of independence, dignity, integration and equality of opportunity for all, in mind.*

**February 2012**

## **Preamble**

The policies contained within the Plan meet the requirements of the Accessibility standards for Customer Service, Ontario Regulation 429/07 and are good practice. Note that the policies may be revised as other standards are introduced under the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA"). Policies may be modified or removed based upon feedback received by our customers.

Under the Ontario Human Rights Code, "disability" means,

- (a) 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,
- (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, 1997; ("handicap")

"Accessibility", in general terms, means the degree to which a product, device, service or environment is available to as many people as possible.

The Plan includes policies, procedures and practices covering:

- 01 Communication
- 02 Assistive Devices
- 03 Service Animals
- 04 Support Persons
- 05 Temporary Disruption of Services
- 06 Feedback Process
- 07 Service Providers Training
- 08 Documentation

## **Section: 01 Communication**

### **1.0 Policy**

- 1.1 It is the policy of Epilepsy Toronto to communicate with people who have a disability in ways that take into account their abilities, providing accessible service within the following formats:
  - Telephone
  - Fax
  - Email
  - In Person
  - Print Copy

- Electronic Copy
- Website
- Electronic Newsletters
- Social Media

## 2.0 Procedure

- 2.1 An employee will address the person's service needs by asking how they would prefer to communicate.
- 2.2 The employee is responsible to communicate as per the request of the person being served, within the available means listed above.
- 2.3 If the request for communication method by the person being served is not available, alternate communication methods will be explained and made available, within the available means listed above.
- 2.4 This policy exists to achieve service excellence for people who have a disability. If anyone has a question about the policy, or if the purpose of a policy is not understood, refer to policy "Feedback Process" under *Accessibility – Section: 06*.

## 3.0 Practices

- 3.1 Epilepsy Toronto is committed to providing fully accessible telephone service to its customers.
  - Staff will be trained to communicate with customers over the phone in clear and plain language.
  - When indicated, staff will utilize the Bell Relay and Bell IP Relay services.
  - Phone and voicemail messages will be returned as soon as practical.
  - Individual staff voicemail will be utilized to advise customers of their availability.
  - The automated switchboard greeting will be programmed as needed to convey information about temporary disruptions of service such as cancelled groups and times when the office is closed.
- 3.2 Recognizing that not all individuals are capable or comfortable using the telephone to communicate, Epilepsy Toronto acknowledges the value of written communication via fax and email.
  - Staff will respond to fax and emailed messages as soon as practical.
  - Outgoing email should be crafted in plain text and in a way that can be easily handled by screen readers.
  - Providing information and documents via email, in person or via the telephone will be considered as an effective alternative to the use of Braille. For some individuals, information may be provided in large print.
  - The confidential nature of some correspondence and potential security issues will be carefully considered when staff use email or fax.
  - [Customer.service@epilepsytoronto.org](mailto:Customer.service@epilepsytoronto.org) is the email portal available to customers to provide feedback about services or register complaints.
- 3.3 In person, staff will:
  - Speak clearly and slowly to people who are deaf, deafened or hard of hearing and in such a way that their mouth can be clearly seen.
  - They will speak to the person with the disability and not the support person or interpreter if present.
  - Use pen and paper for basic communication when indicated.
  - Will have a basic understanding of and willingness to use customer

- supplied augmentative communication devices.
  - In the case of workshops or conferences, attempt to determine if accommodation in the realm of communication is necessary and provide it to the extent possible.
  - In some situations, home, school or workplace visits will be offered as the most effective means of providing support or services.
- 3.4 Documents can be provided in a number of different forms depending on the wishes of the person with the disability.
- Written summaries of meetings with counsellors may be provided upon request.
  - Brochures and booklets that might normally be handed out will be available on the website in a format that can be read easily by a screen reader.
  - Digital media such as memory sticks, CD's and DVD's will be used to make information available such as brochures, forms and conference presentations.
  - Job postings appearing on the job board in the office may be available in other forms upon request.
- 3.5 The internet will become over time a much more valuable means for Epilepsy Toronto to communicate with people with disabilities.
- By 2014, the Epilepsy Toronto website will comply with World Wide Web Consortium (W3C), Web Content Accessibility Guidelines 2.0, Level AA. This will ensure access by people of all abilities and it will be compatible with most technologies utilized by people with disabilities.
  - With each website revision, a Photosensitive Epilepsy Analysis Tool such as that which is available from the Trace Center, will be employed to ensure that seizures are not provoked by web content.
  - Epilepsy Toronto will with an upcoming web revision, ensure that anyone with a physical disability can access the website. The website will carry the eSSENTIAL Accessibility logo.
  - The website will continue to be a valuable source of forms, fact sheets, archived newsletters, information about upcoming events and epilepsy information.
- 3.6 Epilepsy Toronto will continue to take advantage of various forms of social media to reach out to and support persons with disabilities.

## **Section: 02 Assistive Devices**

### **1.0 Policy**

- 1.1 It is the policy of Epilepsy Toronto to serve people with disabilities who use their own assistive devices to obtain, use or benefit from our services. An assistive device is an item a person with a disability may bring with them that is used in accessing goods and services. Some may be visibly apparent and some may not.

### **2.0 Procedure**

- 2.1 An employee will address the person's service needs by asking "How can I assist you?"
- 2.2 The employee will provide service while allowing the person being served to use his or her own personal assistive device/s.

- 2.3 If a request for an assistive device by the person being served is not available from Epilepsy Toronto then an alternate accommodation will be suggested within available means.
- 2.4 This policy exists to achieve service excellence for people who have a disability. If anyone has a question about the policy, or if the purpose of a policy is not understood, refer to policy "Feedback Process" under *Accessibility – Section:06*

### **3.0 Practices**

- 3.1 Epilepsy Toronto staff will offer the in-house benefit of a speech recognition program to customers such as Dragon Naturally Speaking, for accessing the computer.
- 3.2 All staff are familiar with and able to support persons with disabilities with the Accessibility Options available through Windows.

## **Section: 03 Service Animals**

### **1.0 Policy**

- 1.1 It is the policy of Epilepsy Toronto to welcome people who have a disability who are accompanied by a service animal on the parts of our premises that are open to the public. A service animal is an animal that is specially trained to assist a person who has a disability and:
  - It is readily apparent that the animal is used by the person for reasons relating to disability, i.e. either for independent mobility or has a registration tag from an accredited training program.
  - The person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to disability when the need isn't readily apparent.

### **2.0 Procedure**

- 2.1 An employee will address the person's service needs by asking "How can I assist you?"
- 2.2 The employee will provide service while allowing the person being served to use their service animal.
- 2.3 This policy exists to achieve service excellence for people who have a disability. If anyone has a question about the policy, or if the purpose of a policy is not understood, refer to policy "Feedback Process" under *Accessibility – Section:06*

### **3.0 Practices**

- 3.1 Although Epilepsy Toronto welcomes people with service animals to access part of the premises that are open to the public, there may arise occasions where this may not be possible i.e. due to space limitations or accommodation of other disabilities. If such is the case, staff will work with the customer to determine service alternatives or to make arrangements for the care of the service animal elsewhere on the premises.

## **Section: 04 Support Persons**

### **1.0 Policy**

- 1.1 It is the policy of Epilepsy Toronto to welcome people who have a disability who are accompanied by a support person. A support person is someone who accompanies a person who has a disability who may assist with communication, cognitive or memory augmentation, mobility, personal care or medical needs. This person may be a paid support worker, a family member or friend.
- 1.2 Epilepsy Toronto will obtain written consent from the person who has a disability, or their guardian, if confidential information is being shared while the support person is present.
- 1.3 Whereas Epilepsy Toronto may cover the cost of transportation or admission to an event or outing for a customer, it will also be covered for the support person.

### **2.0 Procedure**

- 2.1 An employee will address the person's service needs by asking the person directly, "Would you like *your support person* to accompany you?"
- 2.2 The employee will provide service while allowing the person being served to be accompanied by their support person.
- 2.3 This policy exists to achieve service excellence for people who have a disability. If anyone has a question about the policy, or if the purpose of a policy is not understood, refer to policy "Feedback Process" under *Accessibility – Section: 06*

### **3.0 Practices**

- 3.1 The employee will obtain written consent from the person who has a disability, or their guardian, if confidential information is being shared while the support person is present.
- 3.2 It will be made clear to the support person that information presented in an individual or group setting must remain confidential.
- 3.3 In terms of a service being provided to a group of customers. Verbal consent must be obtained from all group participants for the support person to be present. Otherwise, alternative service arrangements should be made with the person requesting the presence of the support person.
- 3.4 Employees will explain to new customers the purpose and content of the Emergency Response Form and at the discretion of the employee or at the request of the customer, the form will be completed and kept with the other ERFs submitted to Epilepsy Toronto, in a safe and secure location.

## **Section: 05 Temporary Disruption of Service**

### **1.0 Policy**

- 1.1 It is the policy of Epilepsy Toronto to provide notification of planned as well as unexpected disruptions of services that may be used by people who have a disability.

## **2.0 Procedure**

- 2.1 Should a planned or unexpected disruption in facilities or services arise, an employee will fill out a "Notification of Temporary Disruption" form which will explain:
  - Location of Disruption
  - Reason for Disruption
  - Expected Duration of Disruption
  - Alternate Facilities/Services/Path of Travel During Disruption
- 2.2 This policy exists to achieve service excellence for people who have a disability. If anyone has a question about the policy, or if the purpose of a policy is not understood, refer to policy "Feedback Process" under *Accessibility – Section: 06*

## **3.0 Practices**

- 3.1 In the case of an inoperative door opener or elevator a notice will be placed at wheelchair height near the inoperative device suggesting an alternative path of travel.
- 3.2 In the event that the office is scheduled to be closed during "normal" business hours, a Notice of Temporary Disruption will be placed on the entrance doors to the suite, at the reception desk, and in various areas of the premises open to the public. A recorded message will also be placed on the phone system for the benefit of incoming callers.
- 3.3 Staff will advise members of the service disruption as far in advance as possible by phone, email or in person.
- 3.4 The phone system, website, newsletter and social media will be utilized to advise customers of service disruptions.

## **Section: 06 Feedback Process**

### **1.0 Policy**

- 1.1 It is the goal of Epilepsy Toronto to meet and surpass service expectations while serving people with a disability. Comments on our service delivery regarding how well those expectations are being met are welcome and appreciated.
- 1.2 All customers can expect a response to feedback within 5 business days.
- 1.3 Information about the feedback process is readily available to the public.
- 1.4 Where possible, input from the Feedback Process will be made available to the public but Epilepsy Toronto reserves the right to withhold such information in the interest of protecting the privacy of individuals.

### **2.0 Procedure**

- 2.1 Feedback can be provided by:
  - Telephone
  - Email (customer.service@epilepsytoronto.org)
  - Website
  - Fax
  - In person

- Print copy
  - Digital media
  - Feedback form available from reception or the website
- 2.2 All feedback will be directed to the Customer Service Co-coordinator
  - 2.3 An employee will notify the customer that feedback regarding the way Epilepsy Toronto provides services to people who have a disability can be made, within the means listed above.
  - 2.4 An employee will notify the customer that feedback can be provided anonymously but if they wish to be contacted, any personal information that is collected is done so pursuant to Ontario Regulation 429/07, the Accessibility Standards for Customer Service.
  - 2.5 An employee shall advise the customer that if the feedback is in the form of a complaint and if they are not satisfied with the response they receive, they may pursue their complaint further as per Epilepsy Toronto's complaint management guidelines.
  - 2.6 This policy exists to achieve service excellence for people who have a disability. If anyone has a question about the policy, or if the purpose of a policy is not understood, refer to policy "Feedback Process" under *Accessibility – Section: 06*

### **3.0 Practices**

- 3.1 A Notice on the Feedback Process is placed in a conspicuous place in the office, and on the website with the intention of giving customers the opportunity to comment on the delivery of our services.
- 3.2 The Accessibility Feedback form is available for completion on the website, at reception and on demand from any staff member.
- 3.3 If requested, the staff member will assist with the completion of the form.
- 3.4 The Customer Service Coordinator will complete a Record of Customer Feedback once the Accessibility Feedback Form is received or when feedback is provided by some other means. The feedback may require further clarification, research or discussion with other staff, as determined by the Customer Service Coordinator. This individual will then determine if a response is requested or necessary.
- 3.5 In a situation where the Customer Service Coordinator's feedback response to a customer's complaint does not satisfy the customer, the complaint will then be heard by the Executive Director and if unresolved at that point, then by the H.R. Committee of the Board of Directors as per the agency complaint management guidelines. Detailed notes will be maintained on the *Record of Customer Feedback*.

## **Section: 07 Service Providers Training**

### **1.0 Policy**

- 1.1 It is the policy of Epilepsy Toronto to provide training for all employees (full-time, part-time, seasonal and contract), volunteers and others who deal with the public including third parties on behalf of Epilepsy Toronto. In addition, all those who are involved in the development and approvals of customer service policies, practices and procedures must also complete customer service training.

## **2.0 Procedure**

- 2.1 This training will be provided within four weeks of the individuals start date.
- 2.2 Training content, duration and how it is delivered, may vary depending on who is receiving the training and their roles and responsibilities. For example, a full-time employee is likely to attend a formal training session whereas a BuskerFest vendor or Gift Wrap volunteer is likely to receive printed materials only.
- 2.3 Employees will also be trained on an ongoing basis when changes are made to these policies, procedures and practices. Written materials to be handed out to others will be updated as needed and contain a revision date.
- 2.4 A log will be maintained to reflect staff training and material revisions.
- 2.5 Training will include the following:
  - The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the requirements of the Customer Service Standard.
  - A basic understanding of various types of disabilities and the impact they may have on individuals.
  - How to interact and communicate with people with various types of disabilities.
  - How to use the equipment or assistive devices on the premises that may help with the provision of goods and services to people with disabilities.
  - What to do if a person with a disability is having difficulty in accessing goods and services
  - Internal policies, procedures and practices relating to the Customer Service Standard.

## **3.0 Practices**

- 3.1 Staff training for recently hired individuals will take place as part of the orientation process. Staff training is the most in-depth, involving a combination of theory, role-playing and post-training testing.
- 3.2 BuskerFest contractors, gate captains, BuskerAccess and senior volunteers will receive a moderate level of in-person training on how to provide customer service to people with disabilities. All other volunteers, vendors and others likely to have contact with the public, will receive basic training via printed materials.
- 3.3 Gift Wrap staff will receive a moderate level of in-person training on how to provide customer service to people with disabilities. All Gift Wrap volunteers will receive basic training via printed materials.
- 3.4 Staff will be trained on an ongoing basis as changes are made to the Customer Service policies, procedures and practices. Printed training materials are updated as needed.
- 3.5 Taxi companies under contract to Epilepsy Toronto have to provide satisfactory proof when requested, that their staff are fully trained to provide AODA compliant customer service.
- 3.6 Completed training will be noted in the Training Log.

## **Section: 08 Documentation**

### **1.0 Policy**

- 1.1 It is the policy of Epilepsy Toronto to maintain documents related to the Customer Service Standard. A document may be details of Policies, Procedures and Practices, forms needed to facilitate optimal customer service and/or training materials.
- 1.2 All documents are available for the perusal of the general public including employees of the Ministry of Community and Social Services and Service Ontario.

### **2.0 Practices**

- 2.1 All policies, procedures and practices are documented in writing and available from various sources.
- 2.2 All training resources are documented in writing and available from various sources in various forms.
- 2.3 Epilepsy Toronto has created forms including: *Record of Customer Feedback, Training Log, Accessibility Feedback Form, Notice of Temporary Service Disruption, Consent to Share Information in the Presence of a Support Person, Notice on the Feedback Process.*
- 2.4 Epilepsy Toronto will notify customers that documents required under the customer service standard are available upon request.
- 2.5 When giving documents required under the Customer Service Standard to a person with a disability, they will be provided in a format that takes into account the person's disability.
- 2.6 Epilepsy Toronto has a designated Customer Service Coordinator who as the Accessibility Compliance certifier/administrator is responsible for the availability of all documents related to the Standard. This person will facilitate the Feedback Process, maintain the Training log, file Accessibility Compliance Reports with Service Ontario in the first year of operation and every three years thereafter.

### **3.0 Modifications to the Accessibility Plan for Customer Service**

Any policy, procedure or practice that does not respect and promote the independence and dignity of people with disabilities or that inhibits inclusion or equal access to opportunities, will be modified or removed.

Approved by the Board of Directors  
February 20, 2012



### Notice of Temporary Service Disruption

Epilepsy Toronto is experiencing a temporary disruption to its facilities / services.

Facilities / Services have been disrupted at:

Location:	Nature of Disruption:	Expected Duration of Disruption:

Alternate Facilities/Services may be available at:

Location
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We apologize for any inconvenience this temporary disruption this may have caused.

**Inquiries should be directed to:**

**Customer Service Coordinator**

**416 964-9095**

**[customer.service@epilepsytoronto.org](mailto:customer.service@epilepsytoronto.org)**



**If you wish to be contacted, please provide your information:**

<b>FIRST NAME:</b>	
<b>LAST NAME:</b>	
<b>ADDRESS LINE 1:</b>	
<b>ADDRESS LINE 2:</b>	
<b>CITY:</b>	
<b>POSTAL CODE:</b>	
<b>DAYTIME PHONE:</b>	
<b>EVENING PHONE:</b>	
<b>CELLULAR PHONE:</b>	
<b>EMAIL ADDRESS:</b>	

**How do you wish to be contacted?**

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Personal information contained on this form is collected pursuant to Ontario Regulation 429/07, the Accessibility Standards for Customer Service and will be used for the purpose of responding to your comments or request. Inquiries should be directed to:

**Epilepsy Toronto**  
**Customer Service Coordinator**  
**P: 416 964-9095 F: 416 964-2492**  
**[customer.service@epilepsytoronto.org](mailto:customer.service@epilepsytoronto.org)**



### Consent to Share Information in presence of a Support Person

The purpose of this consent form is to enable customers to share confidential information with Epilepsy Toronto in the presence of a support person or interpreter.

**Agreement**

By signing this form, I agree to confidential information being shared while I am in the presence of a support person or an interpreter.

<b>Date:</b>	
<b>Name of Service User (print):</b>	
<b>Signature of Service User:</b>	
<b>Name of Epilepsy Toronto Employee:</b>	
<b>Signature of Epilepsy Toronto Employee:</b>	
<b>Name of Support Person / Interpreter:</b>	
<b>Signature of Support Person / Interpreter:</b>	



### **Notice on the Feedback Process**

It is the goal of Epilepsy Toronto to meet and surpass service expectations while serving our customers. Comments on our service delivery regarding how well those expectations are being met are welcome and appreciated.

Please contact the Customer Service Coordinator at 416 964-9095, by mail or [customer.service@epilepsytoronto.org](mailto:customer.service@epilepsytoronto.org) to share your comments.

Alternatively, the Accessibility Feedback form is available for completion on the website, at reception or from any member of staff.

A copy of our Accessibility Plan for Customer Service may be obtained from any member of staff.



## **Record of Customer Feedback**

Date feedback received:

Name of customer [optional]:

Contact information (if appropriate):

Details:

Follow-up:

Action to be taken:

Staff member:

Date: