

Accessibility for Customer Service Policy - Ontario

1.0 POLICY:

1.1 Farrow recognizes the diverse needs of all our customers and is committed to providing goods and services in a manner that is accessible to everyone. We will maintain the following standards when providing customer service:

- Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities.
- Provision of goods and services to persons with disabilities, and others, will be integrated unless an alternate measure is necessary, whether temporarily or permanently, to enable a person with a disability to obtain, use or benefit from the goods and services.
- Persons with disabilities will be given an opportunity – equal to that given to others – to obtain, use and benefit from the goods and services.

Farrow welcomes the use of service animals, support persons and assistive devices on our premises in all areas that are open to the public. Public notice will be provided when facilities or services, which persons with disabilities rely on to obtain, use or benefits from our goods or services, are temporarily disrupted.

All persons that interact with members of the public or other third parties on behalf of Farrow and persons who participate in developing our policies, practices and procedures governing the provision of goods or services to members of the public or third parties shall be trained as outlined within this procedure.

2.0 RESPONSIBILITY:

2.1 The CEO/Chairman, Vice-Chairman, President, Vice President - Canadian Operations, Director of Human Resources and Payroll and the Corporate Health and Safety Manager have overall responsibility for the implementation of Accessibility for Customer Service.

2.2 Directors, Department Managers and their personnel are responsible to comply with all procedures and practices as outlined within this document.

3.0 SERVICE ANIMALS, SUPPORT PERSON(S) AND ASSISTIVE DEVICES:

3.1 All employees shall use reasonable efforts to allow persons with disabilities to use their own assistive devices to access goods and/or services.

3.2 All employees shall allow persons with disabilities to be accompanied by their service animal to all areas that are open to the public. Service animals are not to be touched, as they are working and need to pay attention at all times.

3.3 If a service animal is unruly or disruptive (jumping on people, biting, or other harmful behaviour) an employee may ask the persons with disability to remove the animal from the area. Other reasonable arrangements to provide goods or services shall be explored with the assistance of the person with disability.



3.4 Support persons may accompany persons with disabilities while accessing goods and/or services.

4.0 NOTICE OF SERVICE DISRUPTION:

4.1 Anytime there is a disruption in a service that a person with disabilities may need to access goods and/or services, the Notice of Service Disruption form must be completed and posted in a conspicuous area as soon as possible.

4.2 Service disruptions may include an entrance way that is under repair, renovations that limit access to an area, technology that is temporarily unavailable or elevators that are out of order.

4.3 Notice will be provided over the phone to individuals who have identified themselves to us as a person with disability and who have scheduled an appointment at our facility. When appropriate, notice may also be provided on our website.

5.0 PROVIDING CUSTOMER SERVICE TO PERSONS WITH DISABILITIES:

Physical Disabilities

5.1 Physical disabilities include a range of functional limitations from minor difficulties in moving or coordinating one part of the body, through muscle weakness, tremors, and/or paralysis. Physical disabilities can be congenital such as Muscular Dystrophy, or acquired such as tendonitis.

5.1.1 This may affect an individual's ability to:

- Perform manual tasks such as holding a pen, turning a key or gripping a door knob
- Move around independently
- Control the speed or coordination of their movements
- Reach, pull or manipulate objects
- Have strength or endurance

5.1.2 There are many types and degrees of physical disabilities and not all require assistive devices like a wheelchair. Follow these guidelines when providing customer service:

- Speak normally and directly to your customer not to their companion or attendant.
- People with physical disabilities may have their own way of doing things. Ask before you help.
- Wheelchairs and other assistive devices are part of a person's personal space. Don't touch, move or lean on the devices.
- Provide your customer information about accessible feature of the immediate environment (automatic doors, accessible washrooms, elevator etc.).
- Keep ramps and corridors free of clutter.
- If a counter is too high or wide, step around it to provide customer service.
- Provide seating for those who cannot stand for long periods of time.
- Be patient. Customers will identify their needs to you.

Hearing Loss

5.2 Hearing loss can cause problems in distinguishing certain frequencies, sounds or words.

5.2.1 A person who is deaf, deafened or hard of hearing may be unable to:

- Use a public telephone
- Understand speech in noisy environments
- Pronounce words clearly enough to be understood by strangers

5.2.2 Hearing loss has a wide variety of degrees. Customers who are deaf or hard of hearing may require assistive devices when communicating. Follow these guidelines when providing customer service:

- Attract the customer's attention before speaking. The best way is a gentle touch on the shoulder or gently waving your hand.
- Always ask how you can help. Don't shout. Speak clearly and ensure you are facing the customer when speaking and not blocking the view of your mouth.
- Be clear and precise when giving directions, and repeat or rephrase when necessary. Make sure you have been understood.
- Deaf people may use a sign language interpreter to communicate. Always direct your attention to the Deaf person, not the interpreter.
- Any personal matters should be discussed in a private room to avoid others from overhearing.
- If the person uses a hearing aid, try to speak in an area with few competing sounds.
- If necessary, write notes back and forth to share information.
- Communications over the phone may need to be done through a relay service.

Vision Disabilities

5.3 Vision disabilities reduce one's ability to see clearly. Very few people are totally blind. Many have limited vision such as tunnel vision, where a person has a loss of peripheral or side vision, or lack of central vision, which means they cannot see straight ahead. Some may see the outline of objects while others can see the direction of light.

5.3.1 Vision loss can result in:

- Difficulty reading or seeing faces
- Difficulty maneuvering in unfamiliar places
- Inability to differentiate colours or distances
- A narrow field of vision
- The need for bright light, or contrast
- Night blindness

5.3.2 Vision disabilities can restrict the customer's ability to read signs, locate landmarks or see hazards. It may be difficult to identify if a person has a vision disability; others may use a guide dog or white cane. Follow these guidelines when providing customer service:

- Verbally identify yourself before making physical contact
- Offer your arm to guide the person. Do not grab or pull
- Never touch your customer without asking permission, unless it is an emergency

- Don't leave your customer in the middle of a room. Show them to a chair, or guide them to a comfortable location
- Don't walk away without saying good-bye

Intellectual Disabilities

5.4 Intellectual disabilities affect a person's ability to think and reason. It may be caused by genetic factors such as Downs Syndrome, exposure to environmental toxins, brain trauma or psychiatric disorders.

5.4.1 A person with an intellectual disorder may have difficulty with:

- Understanding spoken and written information
- Conceptual information
- Perception of sensory information
- Memory

5.4.2 People with intellectual or developmental disabilities may have difficulty doing many things most of us take for granted. These disabilities can mildly or profoundly limit one's ability to learn. Treat your customers with an intellectual or developmental disability like anyone else. They may understand more than you think and will appreciate you treating them with respect. Follow these guidelines when providing customer service:

- Don't assume what a person can or cannot do
- Use clear, simple language
- Be prepared to explain and provide examples regarding information
- Remember that the person is an adult and unless you are informed otherwise, can make their own decisions
- Be patient and verify your understanding
- If you can't understand what is being said, don't pretend, just ask again
- Provide one piece of information at a time
- Speak directly to your customer, not their companion or attendant

Speech Disabilities

5.5 Speech disabilities involve the partial or total loss of the ability to speak.

5.5.1 Typical disabilities include problems with:

- Pronunciation
- Pitch and loudness
- Hoarseness or breathiness
- Stuttering or slurring

5.5.2 Problems communicating could be the result of cerebral palsy, hearing loss, or another condition that makes it difficult to pronounce words, causes slurring or stuttering, or not being able to express oneself or understand written or spoken language. Some people with severe difficulties may use communication boards or other assistive devices. Follow these guidelines when providing customer service:

- If possible communicate in a quiet environment
- Give the person your full attention. Don't interrupt or finish their sentences.

- Ask them to repeat as necessary, or to write their message
- If you are able, ask questions that can be answered 'yes' or 'no'
- Verify your understanding
- Patience, respect and willingness to find a way to communicate are your best tools.

Learning Disabilities

5.6 Learning Disabilities include a range of disorders the effect verbal and non-verbal information acquisition, retention, understanding and processing. People with a learning disability have average or above average intelligence, but take in and process information and express knowledge in different ways.

5.6.1 Learning disabilities can result in:

- Difficulties in reading
- Problem solving
- Time management
- Way finding
- Processing information

5.6.2 Learning disabilities are generally invisible and ability to function varies greatly. Follow these guidelines when providing customer service.

- Respond to any requests for verbal information, assistance in filling in forms and so on with courtesy
- Allow extra time to complete tasks if necessary.

Mental Health

5.7 Mental health disabilities include a range of disorders. Individuals may seem edgy or irritated, act aggressively, be perceived as pushy or abrupt, be unable to make a decision, start laughing or get angry for no apparent reason.

5.7.1 There are three main types of mental health disability:

- Anxiety
- Mood
- Behavioral

5.7.2 Follow these guidelines when providing customer service.

- Treat each person as an individual. Ask what would make him/her the most comfortable and respect his/her needs to the maximum extent possible.
- Try to reduce stress and anxiety in situations.
- Stay calm and courteous, even if the customer exhibits unusual behaviour, focus on the service they need and how you can help.

Other Disabilities

5.8 There are many other disabilities resulting from a range of other conditions. Some of these conditions may be accidents, illness and disease including: ALS, asthma, diabetes, cancer, HIV/AIDs, environmental sensitivities, seizure disorders, heart disease, stroke and joint replacement.

- 5.8.1 Remember that disabilities are not always visible or easy to distinguish. Follow these guidelines when providing customer service:
- Treat each customer with dignity and respect their independence.
 - Don't make assumptions, be courteous and ask how you can help.
 - Offer a variety of methods of communication
 - Understand the nature and scope of the service you offer
 - Never assume you know the best way to serve the customers; always ask.

6.0 TRAINING:

- 6.1 All employees will be trained according to the Ontario Regulation 429/07, Accessibility for Ontarians with Disabilities Act, 2005.
- 6.2 Training may be provided in several different formats depending on need, time constraints and availability. These formats include in person, webinar and print.
- 6.3 Training shall include:
- A review of the purposes of the act
 - The requirements of O. Reg. 429/07
 - How to interact and communicate with persons with various types of disabilities
 - How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person
 - How to use equipment or devices available on our premises or otherwise provided by us that may help with the provision of goods or services to a person with a disability.
 - What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.
- 6.4 Training shall be provided to each person as soon as practicable after he or she is assigned the applicable duties.
- 6.5 Training shall be provided at least annually and when changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities occur.
- 6.6 Training records shall be kept by Human Resources and include the date the training occurred, who attended the training and an outline of the training provided.
- ## **7.0 FEEDBACK:**
- 7.1 An Accessibility Customer Service Feedback Form shall be available at the front reception area to receive feedback on the way we provide goods or services to persons with disabilities. Feedback may also be received in person, via telephone (519-740-9335 x 214), email (hr@farrow.com) or any other available method.
- 7.2 All completed Accessibility Customer Service Feedback Forms shall be sent to Vice President, Canadian Brokerage Operations to be reviewed.
- 7.3 If any complaints arise, the Vice President, Canadian Brokerage Operations shall bring them to the attention of Senior Management to address. If the complaint is valid and is



feasible to implement, implementation must take place in a timely manner and all employees must be trained on the implementation as needed.

8.0 DOCUMENTATION

- 8.1 Documentation relating to the provision of goods and/or services to persons with disabilities shall be available to the public upon request.
- 8.2 A notice shall be posted in the front reception area advising the public that these documents are available upon request.
- 8.3 The documents shall be provided or the information contained in the documents, in a format that takes into account the person's disability. The format may be agreed upon with the person with a disability.

9.0 RECORDS

- 9.1 Forms:
 - Notice of Service Disruption
 - Accessibility Customer Service Feedback Form
- 9.2 Exhibits:
 - Nil
- 9.3 Retention:
 - Records are retained for 6 plus the current year
- 9.4 Uncontrolled Policy:
 - Once this procedure is printed it will become an uncontrolled document.