

	Company Policy	Issued For	Rev Lev
	Accessibility Standards for Customer Service Policy	JD Norman Canada, ULC	C
Document not controlled if printed	Document Number	Approver	Effective Date
	CP-07-6.2.1-02	Human Resources Manager	3/17/2015

1. INTRODUCTION

The Accessibility for Ontarians with Disabilities Act, 2005 (the “Act”) became law on June 13th, 2005. Under this legislation, the government of Ontario is in the process of developing accessibility standards that identify, remove and prevent barriers for people with disabilities in key areas of daily living. These standards apply to private and public organization across Ontario, including JD Norman Industries Canada.

The goal of the Act is to create a more accessible Ontario, by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with disabilities.

The Accessible Customer Service Standard (the “Standard”) has been established under the Act to ensure goods and services are, where at all possible, equally accessible to every member of the public.

At JD Norman Industries Canada, we are committed to providing an environment that is, and feels, accessible for all people. In alignment with our core values, we are committed to providing barrier-free customer service to all, including persons with disabilities.

2. AFFECTED EMPLOYEES

This policy applies to all colleagues who deal with members of the public or third parties in Ontario. This policy also applies to all persons responsible for the development, implementation, or oversight of the JD Norman Industries Canada policies, practices, and procedures.

All employees within the JD Norman Industries Canada facility will be made aware of this policy

3. PURPOSE

This policy has the intent of complying with the requirements of the Accessibility Standards for Customer Service, established by Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005.

The regulation noted above applies to JD Norman Industries Canada, since it is an organization that provides goods and services either directly to the public or to other businesses/organizations and has more than 20 employees in Ontario. Therefore, JD Norman Industries Canada is committed to delivering exceptional accessible customer service to persons with disabilities in a manner that respects the principles of independence, dignity, integration and equality of opportunity.

4. DEFINITIONS

4.1. Accessible Customer Service

- Offering accessible customer service is not about the structure of an organization’s physical premises, nor about changing doors or adding elevators or ramps.
- It’s simply about understanding that customers with disabilities may have different needs and finding the best way to provide them access to goods and services.

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4.2. Disability – Defined under the Act as;

- The term disability as defined by the Accessibility for Ontarian with Disabilities Act, 2005 means: *“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,*
- *a condition of mental 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, or*
- *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”).*

4.3. **Assistive Device** – Any device used to assist a person performing a particular task or tasks or to aid that person in activities of daily living.

4.4. **Service Animal** – An animal is a service animal for a person with a disability, if;

- It is readily apparent that the animal is used by the person for reasons relating to his or her disability, or;
- the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

4.5. **Support Person** - A person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services.

5. PROVIDING GOODS AND SERVICES TO PEOPLE WITH DISABILITIES

JD Norman Industries Canada shall provide exceptional products and services to customers with disabilities acknowledging that they have the same preferences, perceptions, attitudes, habits, and needs as customers without disabilities.

In order to provide accessible goods and services to customers with disabilities JD Norman Industries Canada intends to strive to:

5.1. Understand and Overcome Barriers to Accessibility

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A barrier is any obstacle that keeps people with disabilities from living their full life that makes it difficult or even impossible for them to access certain products and services. Some barriers are visible but many are invisible or hidden. There are four types of barriers to accessibility:

- 5.1.1. **Architectural** and **physical** barriers may result from the design of a building such as stairs, heavy doors or narrow doorways, the width of hallways and even room layout.
- 5.1.2. **Information** or **communications** and **technology** barriers can make it difficult for people to receive or convey information. Things like small print size, confusing design of printed materials and the use of language that is not clear or plain, can all cause difficulty. Also, everyday tools like computers and telephones can present barriers but they can also remove them.
- 5.1.3. **Attitudinal** barriers are those that discriminate against people with disabilities. This is perhaps the most difficult barrier to overcome. Some examples of attitudinal barriers are: thinking that people with disabilities are inferior; assuming that a person who has a speech impairment can't understand what is said; ignoring or avoiding people with disabilities fearing that they could be offended when offered help.
- 5.1.4. **Systemic/Organizational** barriers can occur when attitudes are embedded in policies and procedures. These are any practices or rules that restrict people with disabilities – for example, a hiring process that is not open to candidates with disabilities.

JD Norman Industries Canada will make every effort to provide customer service in a way that removes, or doesn't create barriers for someone with a disability. In order to overcome the barriers described above, JD Norman Industries Canada will attempt to create new ways of doing things so as to provide an equal value and quality service to all customers, making its premises accessible to customers with disabilities, as well as finding alternative ways to ensure that such ones will have access to the same products and services, and will be treated in a similar manner as customers without disabilities.

5.2. Consider a Person's Disability When Communicating with Them

Communication is the key to good customer service. The best way to make communications accessible is by considering the individual's specific needs/disability, because various disabilities require different ways of communication. There are however, general guidelines that will make possible delivering an accessible customer service, regardless the person's type of disability, such as:

- Be willing to find a way to communicate.
- Always ask how you can help.
- Don't assume what a person can or cannot do.
- Speak normally and clearly.
- Be patient and polite.

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- Give the person whatever time they need to get their point across.
- Treat a person with a disability with the same respect and consideration you have for everyone else.

Thus, when communicating with a customer with a disability, JD Norman Industries Canada shall strive to do so in a manner that takes into account his/her disability.

5.3. **Allow Assistive Devices**

An assistive device is any piece of equipment a person with a disability uses to help them with daily living. Some examples include: a wheelchair, screen reader, listening device, oxygen tank or cane.

This policy allows customers to use their own assistive devices to access JD Norman Industries Canada’s goods and services.

Additionally, it is our goal to make it available in our company’s premises assistive devices, such as wheelchairs and canes. Then we will ensure that our staff are trained and familiar with various assistive devices we plan to have on site or that we provide that may be used by customers with disabilities while accessing our goods or services.

5.4. **Allow Service Animals**

Service animal means an animal that has been trained to help people with disabilities. Guide dogs are not the only type of service animal, other kinds of animals can be trained to help a person with a disability.

Thus, people with disabilities are allowed to be accompanied by their guide dog or other service animal in areas of JD Norman Industries Canada that are open to the public. In the event that service animals are prohibited by law, JD Norman Industries Canada will provide other resources or support to enable persons with disabilities to access its services/goods.

5.5. **Welcome Support Persons**

Support persons are those who accompany a person with a disability in order to help him/her with daily tasks, communication, and mobility or with access to goods and services.

JD Norman Industries Canada will welcome all customers or visitors who have disabilities to enter its facilities accompanied by support persons in order to have access to its products and services. JD Norman Industries Canada does not charge fees for support persons.

5.6. **Let Customers Know when Accessible Services aren’t Available**

JD Norman Industries Canada will notify the public in the event of a planned or unexpected disruption in the facilities or service usually used by customers and visitors who have disabilities. This notice will include information about the reason for disruption, its anticipated duration, and a description of alternative facilities or services, if available.

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5.7. Invite Customers to Provide Feedback

JD Norman Industries Canada invites all customers and/or visitors who have disabilities to provide feedback on how it is meeting the needs of persons with disabilities in regards to accessing its goods and services. Individuals are welcome to provide their feedback in person, by telephone, in writing, or by email to the Human Resources Manager at 6845 Hawthorne Drive, Windsor, Ontario, N8T 3B8. JD Norman Industries also has a customer service feedback form that is readily available for all visitors, employees & customers to fill out in order to provide appropriate feedback. Where possible, we will respond to feedback within ten (10) business days of the date that it is received.

6. TRAINING STAFF ON ACCESSIBLE CUSTOMER SERVICE

JD Norman Industries Canada will train employees, volunteers, agents, contractors and other personnel who deal with the public or other third parties on its behalf. Training will also be provided to people involved in the development of policies, plans, practices and procedures related to the provision of goods and services, so they know what is expected of them when it comes to delivering an accessible customer service. New staff will be trained as soon as feasible after they are hired and staff will also be trained when changes are made to JD Norman Industries Canada’s plan. Training will include:

- 6.1. An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- 6.2. JD Norman Industries Canada’s plan to provide accessible customer service.
- 6.3. How to interact and communicate with people with various types of disabilities.
- 6.4. How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- 6.5. How to use any equipment or devices available at JD Norman Industries Canada’s workplace to assist with providing goods or services to people with disabilities.
- 6.6. What to do if a person with a disability is having difficulty in accessing JD Norman Industries Canada’s goods and services.

7. NOTICE OF AVAILABILITY

JD Norman Industries Canada will notify the public that this policy is available upon request, by posting a notice in a conspicuous place in its premises. Furthermore, this Policy, and related practices and protocols, shall be made available to any member of the public upon request.

If a customer with a disability requests documents related to this policy, JD Norman Industries Canada will take into account the person’s disability and provide a copy of the documents in an accessible format.

8. RESPONSIBILITY AND MODIFICATIONS TO THIS POLICY

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It is the responsibility of all JD Norman Industries Canada employees to comply with this policy to the extent of their interaction with customers and visitors who are persons with disabilities. The Department Manager is responsible for enforcing this policy in their respective areas of responsibility.

This policy will be reviewed by JD Norman Industries Canada at least annually or more often if it's necessary. In case this policy does not respect and promote the dignity and independence of people with disabilities it will be modified or removed. Responsibility for maintenance, revision and interpretation of this policy rests with the Human Resources Department.

CHANGE HISTORY LOG

Date of Change	REV	Description of Change
March 17, 2015	C	Annual Review, revised to JD Norman Corporate format
December 19, 2014	B	Revised Company Policy
October 29, 2013	A	Revised to JD Norman Version
January 16, 2012	REL	New Policy