



AODA - Integrated Accessibility Standards Regulation (IASR) Customer Service Policy

Policy Category:

Accessibility for Ontarians (AODA)

Subject:

Integrated Accessibility Standards Regulation (IASR) Customer Service

Office Responsible for Review:

Board of Directors

Related Club Policies and/or By-laws:

N/A

Scope:

Members of the Club, in all categories of membership, their guests and visitors to the Club are governed by this policy.

Policy Statement:

This policy has been developed to meet the requirements of the Customer Service Standards included in the Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005. The procedures outlined in this policy have been implemented to ensure all individuals, including those with disabilities, receive the same value and quality of service. It details the use of personal assistive device, support individuals and employee training. This policy will continuously be reviewed and updated to comply with accessibility standards and provide the necessary accommodations. This policy is administered by the senior leadership team and approved by the Board of Directors.

Definitions:

Assistive Device: A technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that individuals bring with them such as a wheelchair, walker or a personal oxygen tank. The device may be used to assist the individual with vision, hearing, communication, movement, breathing, remembering and/or reading.

Disability: The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 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*.

Guide Dog: A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal: An animal is a service animal for a person with a disability if:

1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. the person provides documentation from a regulated health professional from an accredited college confirming that the person requires the animal for reasons relating to the disability:

Service Dog: As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person: An individual who accompanies an individual with a disability in order to help with communication, mobility, personal care, medical needs or access to goods and services.

Policy:

All goods and services provided by The Credit Valley Golf and Country Club shall follow the principles of dignity, independence, integration, and equal opportunity.

In accordance with the Customer Service Standards, this policy addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices
- The Use of Guide Dogs, Service Animals and Service Dogs
- The Use of Support Persons
- Notice of Service Disruptions
- Customer Feedback
- Training
- Notice of Availability and Format of Required Documents

The Provision of Goods and Services to Persons with Disabilities

The Credit Valley Golf and Country Club 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 receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that customers 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 services; and
- Communicating in a manner that takes into account the customer's disability.

The Use of Assistive Devices – Member's and Guest's Own Assistive Device(s)

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Club.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks present a risk when they are close together. Therefore, the accommodation for an individual with an oxygen tank will involve ensuring the individual is in a location that would be considered safe. When an elevator is not present and if an individual requires assistive devices for the purpose of mobility, service will be provided in a location that meets the needs of the customer.

Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed on the Club premises unless otherwise excluded by law. 'No pet' policies do not apply to guide dogs, service animals and/or service dogs.

A. Food Service Areas

A customer with a disability that has a guide or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

B. Exclusion Guidelines

If a guide dog, service dog or service animal is excluded by law (see applicable laws below) the Club will offer alternative methods to enable the person with a disability to access goods and services. For example, securing the animal in a safe location and offering the guidance of an employee.

C. Applicable Laws

The *Health Protection and Promotion Act, Ontario Regulation 562 Section 60* does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. However, it allows guide dogs and service dogs to go into places where food is served, sold or offered for sale. Other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: In the case of a conflict between this policy and the *Dog Owners' Liability Act* or a by-law passed by a municipality relating to banned breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

D. Recognizing a Guide Dog, Service Dog and/or Service Animal

If it is not readily apparent that the animal is being used by the individual for reasons relating to their disability, the Club may request documentation.

E. Care and Control of the Animal

The customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all times.

F. Allergies

If a health and safety concern arises, for example in the form of a severe allergy to the animal, the Club will make all reasonable efforts to meet the needs of all individuals effected.

The Use of Support Persons

If an individual with a disability is accompanied by a support person, the Club will ensure that both individuals are allowed to enter the premises together. This ensures that the individual with the disability is not prevented from having access to a support person. The Club will not charge the support persons any fees or fares.

There may be times where seating and availability prevent the individual and their support person from sitting beside each other. In these situations, staff will make every reasonable attempt to resolve the issue.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the Club. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use the Club's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

When disruptions occur, the Club will provide notice by:

- posting notices in conspicuous places including at the point of disruption, the main entrance and the nearest accessible entrance to the service disruption and/or on the Club's website;
- contacting individuals with appointments;
- verbally notifying individuals when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

Customer Feedback

The Club will provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on the Club's website. Feedback can be given by verbally (in person or by telephone) or written (handwritten, delivered, website or email).

Submitting Feedback

Customers can submit feedback to:

Jason Hanna, Chief Operating Officer
(905) 275-2505
2500 Old Carriage Road, Mississauga, ON L5C 1Y7
jhanna@creditvalleygolf.com

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Club employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Training

Training will be provided to:

- individuals who are employees of, or volunteer with the Club, the provider.
- individuals who participate in developing the Club's policies.

Regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Customer Service Standards.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- The Club's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

The Club will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors. Revised training will be provided in the event of changes to legislation, procedures, policies, and/or practices.

Record of Training

Training records will be kept including the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents

The Club will notify individuals that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the individual's disability. Notification will be given by posting the information in a conspicuous place owned and operated by the Club, the Club's website and/or any other reasonable method.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Jason Hanna, Chief Operating Officer
(905) 275-2505
2500 Old Carriage Road, Mississauga, ON L5C 1Y7
jhanna@creditvalleygolf.com

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to company procedures.

Effective Date: This policy is effective August 31, 2023.

Approval: August 31, 2023

Jason Hanna
Chief Operating Officer