



## ACCESSIBLE CUSTOMER SERVICE POLICY

### **Purpose**

Continual Energy Inc. (CEI or the “Company”) strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services, in the same place and in a similar way as other customers and visitors.

This policy has been developed to address the Accessible Customer Service Standard of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and applies in conjunction with and should be read together with other policies that affect the provision of services to our customers and visitors.

### **Scope**

This policy applies to all employees, contractors, volunteers and other applicable third parties.

### **Statement of organizational commitment**

CEI is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

CEI understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities.

### **CEI Protocols**

CEI’s commitment to providing access to our facilities and delivering excellent service in a respectful way is demonstrated in the following areas:

#### **Communication**

We will communicate with people with disabilities in ways that take into account their disability. This may include the following:

##### **For Telephone Services**

Our staff will communicate with customers over the telephone in clear and plain language and speak clearly and slowly.

We will offer to communicate with customers by other means of communication such as e-mail if telephone communication is not suitable to their communication needs or is not available.

##### **For E-mail Services**

We will use large print or plain language formats, as may be appropriate in the circumstances.

We will work with the person with a disability to determine what method of communication works for them.

### **Assistive Devices**

CEI permits persons with disabilities to use their personal assistive devices while on CEI's premises.

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

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

### **Use of Service Animals**

We welcome people with disabilities and their service animals on the parts of our premises that are open to the public. When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A regulated health professional is defined as a member of one of the Colleges listed in the AODA.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded;
- discuss with the customer another way of providing goods, services or facilities.

### **Support Persons**

Any person with a disability who is accompanied by a support person will be allowed on our premises with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises. Fees will not be charged for support persons, but sign-in and identification will be required as for all visitors.

In certain cases, CEI might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, CEI will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

### **Notice of Temporary Disruption**

in the event of a planned or unexpected disruption to services or facilities for customers with disabilities, CEI will notify customers promptly. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and reception on our premises, and on our website.

## **Staff Training**

CEI is committed to training its staff and volunteers in accessible customer service, other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, CEI will train all persons who participate in developing our policies, and all other persons who provide goods, services or facilities on our behalf.

Training of our employees and volunteers on accessibility relates to their specific roles.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

Training includes:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- CEI's policies related to the Customer Service Standards
- 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
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

When required by applicable laws, we maintain records of the training provided including the dates on which the training was provided in the number of individuals to whom it was provided.

## **Information and communications**

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If CEI determines that information or communications are unconvertible, we will provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

We notify the public about the availability of accessible formats and communication supports by posting it at our facility public entrances and posting on our website.

We will also meet internationally – recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario’s accessibility laws.

### **Feedback Process**

CEI welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback regarding the way CEI provides goods and services to people with disabilities can be made in person or by e-mail.

All feedback, including complaints, will be handled in the following manner:

All feedback will be forwarded to Josh Kahan and will be reviewed with the management team. Customers can expect a response within fourteen (14) days of receipt of the feedback.

E-mail: [accessibility@continual.net](mailto:accessibility@continual.net)  
Phone: 1-800-610-4109

CEI ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports on request.

### **Notice of Availability of Documents**

CEI will notify the public that documents related to accessible customer service, are available upon request by posting a notice at all public entrances and reception on our premises, as well as on our website.

CEI will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and at no additional cost.

### **Employment**

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee’s accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making

the request in determining the suitability of an accessible format or communication supports specifically for:

- information that is needed in order to perform the employee's job; and
- information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- when the employee moves to a different location in the organization;
- when the employee's overall accommodation needs or plans are reviewed; and
- when CEI reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

If CEI develops performance management, career development and redeployment processes they will take into account the accessibility needs of all employees.

#### **Modifications and Review to This or Other Policies**

We are 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. Any policy of CEI that does not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

This Policy and all relevant policies will be reviewed as needed from time to time to comply with our obligations.

#### **Questions About This Policy**

This Policy exists to achieve service excellence to customers with disabilities. Questions about this policy should be referred to Josh Kahan at [accessibility@continual.net](mailto:accessibility@continual.net).