

## AODA Standards and Template Policy for CRC Churches in Ontario

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### Accessibility Standards for Customer Service A Guide for CRC Churches in Ontario

#### Introduction

The Accessibility for Ontarians with Disabilities Act (AODA) 2005 has established standards for public, private and not-for-profit sectors to comply. The goal is to remove barriers for people with disabilities and to make the province accessible by 2025.

#### Current standards are:

1. Customer Service
2. Information and Communications
3. Employment
4. Transportation
5. Built Environment

Accessibility Standards for Customer Service came into force January 1, 2008. The timeline for compliance and reporting under the Customer Service Standard for the Private and Not-For-Profit sectors was January 1, 2012.

The Final Regulation combines Accessibility Standards in three areas – Information and Communications, Employment, and Transportation, and came into force July 1, 2011. Compliance timeline for small Private and Not-For-Profit sectors was January 1, 2015.

The definition of “customer service” in a church environment can be interpreted as those who come to your church, such as congregation members, church attendants, students, community friends, etc. It may also extend to include those who rent the church building facilities for weddings, funerals, conferences, etc.

For Not-For-Profit organizations, including churches, the Accessibility Standards for Customer Service requires that your church:

1. **Develop customer service policies**, practices and procedures on providing goods and services to people with disabilities.
  - a. Policies – to indicate what your church intends to do, including any rules for staff and volunteers.
  - b. Practices – to indicate what are the usual practices of your church, including how your staff and volunteers actually offer or deliver services.
  - c. Procedures – to reflect your church policies, describe how your church will go about providing service or the steps staff and volunteers are expected to take in certain situations.
2. **Use reasonable efforts** to ensure that all your policies, practices and procedures are consistent with the 4 principles laid out in the customer service standard:

**Dignity** – program, ministry, goods or service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.

**Independence** – when a person with a disability is allowed to do things on their own without unnecessary help or interference from others.

**Integration** – program, ministry, goods or service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable a person with a disability to access programs, ministries, goods and services.

**Equal opportunity** – program, ministry, goods or service is provided to a person with a disability in such a way that they have an opportunity to access your programs, ministries, goods or services equal to that given to others.

**3. The following items should be included in the policy:**

- a. Welcome service animals and support persons
  - i. Allow guide dogs and other service animals to accompany people with disabilities on parts of your premises that are open to the public or other third parties, except where excluded by law.
  - ii. If guide dogs or other service animals are excluded by law, provide alternate ways for people with disabilities to access your goods or services.
  - iii. Allow people with disabilities to be accompanied by a support person when on parts of your premises that are open to the public or other third parties.
- b. Allow people to use their own personal assistive devices and on any measures your church offers to enable people to access your programs, ministries, goods or services.

**4. Provide notice of temporary disruption**

Provide notice to the public when there is a temporary disruption (planned or unexpected) of facilities or services that are usually used by people with disabilities to access your programs, ministries, goods or services.

**5. Provide Training**

- a. **Train staff and volunteers and other people who interact on behalf of your church with people of disabilities.** Train staff and volunteers and other people who participate in developing your policies, practices and procedures on the provision of program, ministry or service to the public in accordance with the training requirements set out in the standard. Provide the training as soon as it is practicable after they are assigned applicable duties.
- b. **Provide ongoing training in connection** with changes to your policies, practices and procedures governing the provision of programs, ministries, goods or services to people with disabilities.

**6. Communicate with people with disabilities**

When communicating with a person with a disability, do so in a manner that takes into account the person's disability.

**7. Feedback Process**

Establish process for feedback and your response to the feedback with regards to the programs, ministries, goods or services are provided to people with disabilities.

## **8. Documentation**

Requirements if your church is a provider of programs, ministries, goods or services with 20 or more employees (full-time, part-time, seasonal, and contract, not including volunteers and independent contractors), you must:

- a. Notify your customers that the documents required under the standard are available upon request by posting the notice at a conspicuous place on the premises you own or operate, by posting it on your website or by another method that is reasonable in the circumstances.
- b. Provide a copy of the required documents to anyone who asks for them.
- c. When providing documents required by the customer service standard to people with disabilities, do so in a format that takes into account the person's disability.

### **Areas of Possible Barriers/Disabilities for consideration:**

- Vision Loss
- Deaf, deafened, oral deaf or hard of hearing
- Intellectual/Development disability
- Learning disability
- Mental health disability
- Physical disability
- Speech impairment

### **PLEASE NOTE:**

This document is not legal advice and should be read together with the official language of the Accessibility Standards for Customer Service, Ontario Regulations 429/07 ("the Standard") and the Accessibility for Ontarians with Disabilities Act, 2005.

If there is any conflict between this document, the Standard, and the Accessibility for Ontarians with Disabilities Act, 2005, the Standard and the Accessibility for Ontarians with Disabilities Act, 2005 are the final authorities.

## Template

### Accessibility for Ontarians with Disabilities Act (AODA) Customer Service Standards Policy

#### 1. Our Theological Position

- a. The Church values people with disabilities as created in the image of God, as partners to the covenant, and as co-labourers in the kingdom of God.
- b. The Church considers all people — with disabilities and without — to have gifts from the Holy Spirit, and we encourage everyone to enrich congregational life by practicing their faith and using their gifts in ministries of discipleship, leadership, and mission.
- c. The Church endeavours to integrate people with disabilities into all ministries and activities of the Church in keeping with the beliefs and practices taught in Scripture. This includes worship, education, small groups, outreach, activities, etc.
- d. The Church seeks to name, understand, and attend to the special spiritual, physical, and psychological needs of those of us affected by disabilities, including caregivers, and will offer training to respond appropriately to disability issues and to raise awareness in the Church.
- e. The Church seeks to remove all barriers to participation with ample discussion by all parties concerned in order to accomplish this goal in an open and reasonable way.

#### 2. Our commitment

In fulfilling our purposes and theological position, the Church strives at all times to provide its programs, ministries, goods and services in a way that respects the dignity and independence of people with disabilities. The Church is also committed to giving people with disabilities the same opportunity to access its programs, ministries, goods and services and allowing them to benefit from the same services, in the same place and in a similar way as to people without disabilities.

#### 3. Application of policy

This policy shall apply to every person who deals with members of the public or other third parties on behalf of the Church, whether the person does so as an employee, volunteer, agent or otherwise (collectively referred to as “staff”).

#### 4. Providing programs, ministries, goods and service to people with disabilities

The Church is committed to excellence in serving all customers, including people with disabilities, and we will carry out our functions and responsibilities in the following areas:

##### a. Communication

We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

##### b. Telephone services

We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by [insert other means of communication that apply, e.g. email, TTY, relay services] if telephone communication is not suitable to their communication needs or is not available.

##### c. Assisted devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our programs, ministries, goods and services. We will ensure that our staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our programs, ministries, goods or services. We will also ensure that

our staff know how to use the following assistive devices available on our premises for customers: [insert list of assistive devices available on premises].

#### **5. Use of service animals and support persons**

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the Church's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

#### **6. Notice of temporary disruption**

The Church will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. 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 service counters on our premises.

#### **7. Training of staff**

The Church will provide training to all staff, and all those who are involved in the development and approvals of customer service policies, practices and procedures. Individuals in the following positions will be trained: [Insert list of positions that require training, for example, Ushers, Greeters, Other Front-Line volunteers/staff etc.]

This training will be provided [insert how long after hiring staff that training will be provided] after staff commence their duties.

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- 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 [name equipment or devices , e.g. TTY, wheelchair lifts, etc., available on provider's premises or otherwise that may help with the provision of programs, ministries, goods or services to people with disabilities]
- What to do if a person with a disability is having difficulty in accessing the Church's programs, ministries, goods and services and/or the Church's policies, practices and procedures relating to the customer service standard.

Applicable staff will be trained on policies, practices and procedures that affect the way programs, ministries, goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

#### **8. Feedback process**

The ultimate goal of the Church is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way the Church provides goods and services to people with disabilities can be made by [insert the ways feedback can be provided, for example, e-mail, verbally, suggestion box, feedback card, etc.]. All feedback will be directed to [insert title of person responsible for receiving feedback]. Customers can expect to hear back in [indicate number of days].

**9. Modification to this policy**

The Church is 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 the Church that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

**10. Questions about this policy**

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, [insert title of supervising staff] of the Church.

Adopted by the Council of [insert name of the church] as attested to by the signatures of the Chair and Clerk of Council this [insert date adopted].

Chair \_\_\_\_\_

Clerk \_\_\_\_\_

## Sources for this Document

Thanks to several individuals from Classis Hamilton, Christian Reformed Church, for assembling and editing this document. Much of the language in this AODA Standards and Template Policy for CRC Churches in Ontario has been taken from documents which the editors found on the Internet from Christian Reformed Disability Concerns ([www.crcna.org/disability](http://www.crcna.org/disability)), Christian Horizons ([www.christian-horizons.org](http://www.christian-horizons.org)), and Canadian Baptists of Ontario and Quebec ([www.baptist.ca](http://www.baptist.ca)).

## Legal Review and Disclaimer

This AODA Standards and Template Policy for CRC Churches in Ontario has been reviewed and edited by David J. Mifsud, Associate, Ross & McBride, LLC, but it should not be construed as legal advice. You should contact an attorney for advice on specific legal issues.

## Compliance Assistance Resources

You can order a copy of the customer service standard or get more information about it by contacting the following: Accessibility for Ontarians with Disabilities Act (AODA) Contact Centre Service Ontario Toll-free: 1-866-515-2025

TTY: 416-325-3408 / Toll-free 1-800-268-7095

Fax: 416-325-3407

You may also want to refer to the Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07.

**Further information** that will help providers comply with the standard may be found on the Accessibility Directorate's compliance assistance website at: [www.AccessON.ca/compliance](http://www.AccessON.ca/compliance).

## For more information on the Accessibility for Ontarians with Disabilities Act:

1. See [www.AccessON.ca](http://www.AccessON.ca)
2. To read the Act, see <https://www.ontario.ca/laws/statute/05a11>

## To read the customer service standard:

1. Go to the website [www.AccessON.ca/compliance](http://www.AccessON.ca/compliance)
2. Click on Accessibility Standards for Customer Service Regulation, O. Reg. 429/07
3. This will take you to the customer service standard .

## Available Training Resources

1. Go to the web based training course provided by Christian Horizons at: <http://public.chconnect.org/AccessibilityChurches/Church%20Accessibility%20-%20August%2029,%202012.htm>
2. The Ontario Government also has a training course at: <http://curriculum.org/sae-en/> and at: <http://www.mcsc.gov.on.ca/en/mcsc/programs/accessibility/index.aspx>
3. Check the Disabilities Concerns AODA resources page from time to time to find current information. It can be found at: [www.crcna.org/aoda](http://www.crcna.org/aoda)