



Guidelines

Accessible Customer Service Policy

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1. Introduction

Toronto Community Housing's Accessible Customer Service Policy recognizes that customer service for persons with disabilities is an important issue that needs to be addressed throughout our portfolio. Toronto Community Housing is committed to the principles outlined in the Accessibility Standards for Customer Service under the *Accessibility for Ontarians with Disabilities Act*.

1.1. Purpose

These guidelines were developed to assist Toronto Community Housing's employees, volunteers, contractors and agents in applying the Accessible Customer Service Policy. They also set out Toronto Community Housing's specific commitments to its customers under this Policy.

1.2. Principles

Toronto Community Housing shall provide accessible customer service in accordance with the following key principles:

Customer service will be provided in a way that respects the dignity and independence of persons with disabilities.

Customers with disabilities shall fully benefit from the same services, in the same place and in the same or similar way as all other customers unless an alternate measure is necessary.

Customers with disabilities will be provided the same opportunity to access our services as all other customers.

2. Support Persons

Our Policy

Any person with a disability who is accompanied by a Support Person will be allowed to access any services provided by Toronto Community Housing with his or her Support Person. At no time will Toronto Community Housing prevent a person with a disability who is accompanied by a Support Person from having access to his or her Support Person.

Where there are barriers to access or attendance by a Support Person at sponsored meetings, consultations or events, Toronto Community Housing will seek to facilitate access so as to ensure the participation of persons with disabilities.

2.1. What is a Support Person?

A support person is someone who is chosen or hired by a person with a disability to accompany and assist him or her with communication, mobility, personal care, medical needs or with access to goods or services.

2.2. Access to Toronto Community Housing services and facilities

Any person with a disability who is accompanied by a Support Person will be allowed to access any services provided by Toronto Community Housing with his or her Support Person.

2.3. When is it necessary to require a support person?

Toronto Community Housing will rarely encounter situations where we would require a person with a disability to be accompanied by a support person during their presence on the premises or participation in activities on the premises. However, in certain situations it may be necessary to fulfill our obligation to protect the health or safety of the person with a disability or the health and safety of others on the premises. At the same time, people with disabilities are free to accept a reasonable risk of injury to themselves just as other people do. Different individuals will have a different tolerance for risk. Risk should be weighed against any benefit for the person with a disability.

When considering whether a support person is required, the following criteria shall be used in consultation with the tenant or customer:

- whether the risk to health and safety is greater than the risk associated with other tenants/customers;

- whether there is a clear and significant risk to the health and safety of the person with a disability or others;
- whether the risk cannot be eliminated or reduced by other means;
- the assessment of the risk is based on consideration of the nature and severity of the potential harm, the duration of the risk, the likelihood that the potential harm will occur and how imminent the potential risk is;
- the assessment of risk is based on the person's actual characteristics, not on perceived risk that is based on generalizations, misconceptions or fears about a disability.

For example, tenants, staff and other volunteers help build a playground sponsored by a playground company. A tenant volunteer has paralysis in her arm and leg and often uses a wheelchair. In this case, the volunteers do not need to have any special skills and clear instructions are given by the playground company. Staff will not assume that the person is unable to participate unless they notice that the person is posing a health or safety risk to themselves or others during the activity. If they see that the person may be posing a risk, instead of assuming that the person cannot participate without a support person, staff will discuss the risk criteria with the person.

This criteria does not apply to

- eligibility for rent geared-to-income ("RGI") assistance or the requirement for support services when a person is not able to live independently. Those decisions are governed by the *Social Housing Reform Act* and/or the *Housing Services Act*;
- the need for supports or referral to supports for tenancy-related matters

2.4. Fees and charges

Toronto Community Housing rarely charges a fee for admission to an event, function, or for a service. If there is such a fee, Toronto Community Housing will provide notice in advance about the amount, if any, that is payable by a support person accompanying a person with a disability. This information will be provided on posters, in brochures, included on telephone recordings, or other means used for advertising the event or function.

2.5. Live-in Caregivers

When a tenant with a disability is in receipt of RGI assistance and requires live-in care or support, decisions about the household composition, RGI amount and the number of bedrooms for which the household is eligible will be made in accordance with the *Social Housing Reform Act* and/or the *Housing Services Act* and related City Guidelines.

2.6. Communication with customers and their support persons

If a person with a disability attends a meeting, event or attempts to access service with a support person in attendance, staff, volunteers and third party contractors will make a reasonable effort to accommodate both the person with a disability and the support person within the available space.

When staff, volunteers and third party contractors discuss confidential information with a person who is accompanied by a support person, the person with a disability will be asked whether the support person may remain present, prior to discussing any confidential information. This must be done at each separate meeting, as circumstances may change between meetings and based on the nature of the discussion.

- If the person with the disability chooses to have the support person present during the discussion or disclosure of confidential or personal information, staff, volunteers and third party contractors will document their consent in their notes or with a consent form to be maintained in the tenant's file.
- If the person with the disability chooses not to have the support person present, staff will offer a close and comfortable location where the support person can wait.

3. Service Animals

Our policy:

Toronto Community Housing is committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public.

If a service animal is excluded by law, Toronto Community Housing will suggest appropriate alternatives and provide assistance in order to ensure that the person is able to access, obtain, use or benefit from Toronto Community Housing's services where possible.

3.1. What is a Service Animal?

A Service Animal is an animal trained specifically to assist an individual with a disability, either where it is readily apparent that the animal is a service animal or where a letter has been provided by a doctor or nurse confirming that the person requires the animal for reasons related to a disability.

3.2. Access to Toronto Community Housing services and facilities

Toronto Community Housing will allow individuals with a disability who are accompanied by a service animal to enter the premises and keep their service animal with them as they use all parts of the premises open to the public or third parties and where not excluded by law.

The tenant, customer or visitor is responsible for the care, supervision and control of their service animal while on the premises.

3.3. Where other animals or pets are restricted

Toronto Community Housing doesn't often have rules or policies regarding the presence of animals in buildings or during activities or events. When there are such rules or policies, they cannot prevent a person with a disability accompanied by a service animal from entering or using these premises, unless the animal is excluded by law.

If it is not readily apparent that the animal is a support animal, Toronto Community Housing will request documentation from the person. This would include situations when the animal is not wearing a harness, collar, sign or vest identifying them as a

service animal and when it is not readily apparent that the animal is being used by the person for reasons relating to their disability.

If it is unclear whether an animal is a service animal, staff can request documentation in the form of a letter from a doctor or nurse that says the animal is needed because of a disability. Other acceptable documentation includes: a certificate or identification card from a service animal training school, or an identification card from the Attorney General of Ontario.

If required documentation is not available when requested, staff is not obligated to allow entry of the animal onto the premises until such documentation is available. Staff should however use discretion on this issue recognizing that visitors may not be aware of the building's policies.

4. Assistive Devices

Our policy:

Persons with disabilities shall be permitted to obtain, use or benefit from goods or services through the use of their own assistive devices. Staff will be trained so as to be familiar with various assistive devices that may be used by customers with disabilities while accessing services.

In the event a person with a disability is hindered from accessing any goods or services offered, Toronto Community Housing will seek to accommodate the person by offering the use of another assistive device that is available or an alternative way of delivering the same service.

Toronto Community Housing will ensure that staff know how to use assistive devices available in their various locations for customers, and inform customers of the assistive devices that are available.

4.1. What is an Assistive Device?

An Assistive Device is a device used to assist persons with disabilities in carrying out activities of daily life or accessing services including, but not limited to, wheelchairs, walkers, canes, note-taking devices, portable magnifiers, recording machines, personal oxygen tanks, and devices for grasping.

4.2. Use of Assistive Devices

Toronto Community Housing will allow people with disabilities to use their own personal assistive devices to obtain, use or benefit from Toronto Community Housing's services, unless there is a defined risk associated with that use.

If a person with a disability is unable to access Toronto Community Housing's services through the use of their own personal assistive device, Toronto Community Housing will assess alternative service options to meet the needs of the individual. For example, if a person cannot attend a face-to-face meeting at an office because it is not accessible, an alternative location or means of communication will be used.

Requests for service accommodation are made directly to the person or unit at Toronto Community Housing delivering that service. For example, if it involves tenancy administration, the request will be made to the Operating Unit staff.

5. Feedback

Our policy:

The goal of Toronto Community Housing is to meet and surpass expectations while providing services to customers with disabilities. Feedback on our services and whether expectations are being met are welcome and appreciated.

Feedback may be provided by a person with a disability in the manner deemed most convenient to them, such as in person, by telephone, in writing, by email or otherwise.

All feedback will be kept in strict confidence and used to improve customer service. In addition, the author of the feedback will be provided a response in the format requested (or the most appropriate format where no request was made) outlining actions taken.

Where an individual is not satisfied with Toronto Community Housing's response to their feedback, staff will direct their complaint to the appropriate individual to respond in accordance with the Toronto Community Housing's Tenant Complaint Procedure.

5.1. What is feedback?

A good way to learn about barriers that exist is to collect comments from people with disabilities who use our services or facilities. Feedback is welcome and encouraged, and it can take the form of a complaint or positive comments.

The following are examples of feedback related to accessible customer service:

- compliance with the Accessible Customer Service Policy or guidelines
- timeliness of our response to a request from a person with a disability for an alternative way to access or receive our services
- interactions between a person with a disability and an employee, volunteer, contractor or agent
- the availability of information or services
- the accessibility of information or services (e.g. format of documents; having a meeting in a location that isn't accessible)

5.2. How do we receive comments or complaints?

It is important to take into consideration the various ways people with disabilities communicate. Feedback may be provided by a person with a disability in the manner deemed most convenient to them.

Toronto Community Housing encourages feedback through the **Client Care Centre (416-981-5500)**. Feedback can also be provided in person, in writing or by e-mail through:

- the local Operating Unit office
- the Superintendent
- help@torontohousing.ca for non-emergency tenant service
- info@torontohousing.ca for general inquiries or comments
- Comment form on torontohousing.ca

5.3. How do we respond to comments or complaints?

The feedback will be directed to the person or business unit responsible for the service. For example, feedback about contractor work in the building will be directed to the Superintendent. Feedback about a particular employee or volunteer of Toronto Community Housing will be directed to the person's supervisor.

Responses to feedback are encouraged, but not required unless the person requests a response or action is necessary to resolve a complaint. If a response is required, Toronto Community Housing will:

- respond to the author of the feedback in the format requested (or the most appropriate format where no format was requested).
- in the response, acknowledge the feedback and indicate what action(s) have or will be taken and a timeframe for completion if applicable.
- keep the feedback confidential. The feedback will only be used or shared in accordance with applicable privacy legislation

Feedback and responses will be documented in EasyTrac under the appropriate category.

5.4. What if the individual is not satisfied with the response?

Where an individual is not satisfied with Toronto Community Housing's response to their feedback, staff will direct their complaint to the appropriate individual to respond in accordance with the Toronto Community Housing's Tenant Complaint Procedure and any other escalation process that is in place.

6. Notice of Temporary Disruptions

Our policy:

Toronto Community Housing is aware that the operation of its services and facilities is important to its customers. However, temporary disruptions in services and facilities may occur.

Toronto Community Housing will provide its customers with notice of any disruption to its services, including information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that may be available.

Notice of service disruptions will be provided as soon as staff is aware of the disruption, or in advance in the case of planned disruptions. Notice will be provided by a variety of methods, depending on the circumstances, and may include postings in conspicuous places at the affected premises, in other Toronto Community Housing facilities, on Toronto Community Housing's website or by any other means that will ensure that the notice reaches those persons potentially affected by the temporary disruption in a manner that is accessible to them.

6.1. What is a temporary disruption of service?

People with disabilities rely on certain facilities or services at Toronto Community Housing such as elevators, ramps or accessible washrooms. When these facilities or services exist but are temporarily unavailable, we must provide notice of the disruption. This notice is important to people with disabilities because they may go to a lot of trouble to access our facilities or arrange for transportation.

Disruptions can be planned or unplanned. Some disruptions affect all customers, for example when the Operating Unit office is closed or the Client Care Centre (call centre) is temporarily unavailable. Other disruptions prevent or make it more difficult for a customer with a disability to access or use Toronto Community Housing services or facilities. For example:

- One of the elevators is down because of planned repairs
- One of the elevators is slow or unavailable because it is being used by movers
- The entrance power door is broken
- The wheelchair ramp is under construction
- Accessible parking spots are moved due to construction

Good customer service requires us to notify customers when there is any kind of disruption. In addition, when the disruption affects the services or facilities used by people with disabilities, the Accessibility Standards require us to notify people in a

variety of ways and sets out what information we need to give to customers about the disruption.

6.2. What information do we give customers about the disruption?

Toronto Community Housing will provide customers with **notice** of any disruption to its services and will inform them about:

- date(s) of the disruption
- which service or facility is unavailable (e.g. elevator #1; the door in the south entrance; water in the north tower)
- the reason for the disruption (e.g. scheduled maintenance)
- how long we expect the disruption to last
- a description of alternative facilities or services, if any, that a person can use during the disruption (e.g. use the east entrance)
- contact for more information (e.g. call 416-981-5500)

6.3. When do we notify customers of the disruption?

Planned disruptions: notice will be given to customers as soon as it is available, and no later than 48h in advance of the disruption. In cases of major disruptions, the notice will give customers enough time to make alternate arrangements during the disruption.

Unplanned disruptions: notice will be given to customers as soon as Toronto Community Housing becomes aware of the disruption. If the full extent or duration of the problem is unknown at the time, an update will be provided as soon as the information is available

Notices will be removed and/or updated when there is a change in the nature or extent of the disruption and when the service is restored

In all cases, the Client Care Centre should be informed of the disruption and updated as changes occur. This will help respond to customer inquiries during the disruption.

6.4. How do we notify customers of service disruptions?

Staff responsible for the service or facility must notify customers or members of the public as applicable when that service or facility is temporarily unavailable or disrupted.

For all disruptions, Toronto Community Housing will post a written notice informing customers of the disruption. The notice will be:

- In Arial or Verdana font, at least 16 **font** size
- Placed in conspicuous places. Consideration should be given to the **height** and **placement** of notices so that people who use mobility devices will be able to readily view the notice.

For disruptions that have an impact on people with disabilities, Toronto Community Housing will inform customers of the disruption using the methods described below.

6.5. Offices

Examples of service disruptions in the offices include:

- Office closures: Offices are open during regular business hours and these hours are posted at the entrance to the office and on torontohousing.ca. In rare circumstances, the office will be closed during regular business hours or the services will be available temporarily at another location
- Ramp closure or repair
- Entrance power door repair
- Power outage

Written notices will be placed at the entrance to the office and in other locations close to the office. Information about the disruption will be available on torontohousing.ca and through the Client Care Centre.

If the disruption is unplanned and it interferes with existing appointments or meetings, the employee who has the appointment will contact the person to inform them of the disruption and reschedule the appointment or offer an alternative.

6.6. Client Care Centre

The Client Care Centre (also known as the call centre) is a key point of contact for customers through the (416) 981-5500 number. It is available 24/7. In the event that the line is temporarily unavailable, Toronto Community Housing staff will be informed and an automated message will be used.

6.7. Residential Buildings

When a building service or facility is temporarily unavailable or disrupted, and persons with disabilities usually use that service or facility in order to access or use parts of the building, Toronto Community Housing will follow the additional steps outlined in this section.

6.7.1. Who is notified of the disruption?

Tenants and the public are notified through written notices posted in the building and through the process outlined below. In addition, the Client Care Centre will be notified of all building disruptions, along with any users of the building who are impacted by the disruption. If the disruption impacts commercial areas of the building, the Commercial Business Unit must be informed.

6.7.2. How do we notify tenants?

Written notice: Written notices shall be posted in conspicuous places throughout the building, including the lobby, the entrance to the facility, by the elevators on each floor. The notice may also be placed in the office or delivered to tenants' units.

Other ways to notify: For some tenants, posting notices may not be an appropriate means of communication. For example, some may not be able to read or see the notices. Others may not leave their apartments frequently and may not see the notice in time.

Toronto Community Housing does not always know when a tenant requires different form of communication, but will document when a tenant informs us of special needs or requests different communication in the event of a disruption. Toronto Community Housing will make every effort to notify these tenants of the temporary disruption using one or more of the following options:

- Telephone call
- Knocking on the door
- Sliding the notice under the tenant's door

In many cases, staff know the tenants in the building and will know how to best communicate with them. The need for different communication can also be determined based on the tenant information in EasyTrac or the list of tenants needing assistance during an evacuation (fire safety plan).

6.8. Major Disruptions in Residential Buildings

Major disruptions can have a significant impact on all tenants, especially for tenants with disabilities because it may be more difficult for them to find alternatives during the disruption. Examples of major disruptions include:

- the only elevator in the building is down
- heat is off for an extended period

6.8.1. How do we notify tenants?

If such a major disruption is planned and necessary, Toronto Community Housing will inform tenants as soon as it is aware of the disruption using some of the following methods:

- written notices and other methods described above
- building meetings
- asking the tenant representative to help by telling other tenants about the disruption

When planning a major disruption, consideration must be given to the timing of the notice so that tenants have time to make alternate arrangements if needed during the disruption.

If a major and unexpected disruption occurs outside of regular business hours and it is urgent that tenants are informed before regular business hours resume, the on-call manager or supervisor will use or ask contractors to use any or all of the following options:

- written notices
- automated telephone calls from the Client Care Centre (if the technology is available)
- engage the Community Safety Unit and/or their contractors to knock on tenants' doors to notify them of the disruption

6.8.2. Who else needs to be involved?

When planning for or responding to a major disruption, Toronto Community Housing will consider alternatives to the service or facility that may be available directly through Toronto Community Housing or through 3rd parties such as:

- additional on-site staff during regular business hours
- Community Safety presence or the presence of contract security after hours
- additional on-site presence from community agencies
- use of the community room or other facilities during the disruption
- staying with friends or family during the disruption

Toronto Community Housing will also notify any community agencies that are based in the building or that currently deliver services to tenants in the building, so that they are available during the disruption to support their clients. Additional community agencies may be able to assist tenants during the disruption by visiting tenants, delivering meals or providing other services.

Toronto Community Housing will notify other stakeholders who may need to be aware of the disruption, including:

- emergency responders such as EMS and Toronto Fire if there could be an impact on any emergency response during the disruption (e.g. elevators)
- City Councillor
- Toronto Community Housing's Public Affairs group