

## **Accessibility for Persons with Disabilities - Ontario, CA: Customer Service**

### **Statement of Commitment**

At Atlas Tube, we are committed to providing our products and services to all of our customers in a way that respects the dignity and independence of persons with disabilities. Furthermore, we are committed to offering equal opportunity to access our products and services and to providing the benefit of the same services, in the same place and in a similar way to all customers including persons with disabilities.

### **Purpose**

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties.

### **Application**

- a) This policy applies to the provision of goods and services at premises owned and operated by Atlas Tube.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Atlas Tube, including when the provision of goods and services occurs off the premises of Atlas Tube such as in: delivery services, vendors and drivers.

### **Definitions**

Assistive Device - is 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 customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, 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 - is a highly-trained working dog that has been trained at a specialized facility to provide mobility, safety and increased independence for people who are blind.

Service Animal/Service Dog - an animal is a service animal/service dog 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
- if the person provides a letter from a medical practitioner confirming that the person requires the animal for reasons relating to the disability.

Support Person - a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

## **General Principles**

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities;
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

## A. The Provision of Goods and Services to Persons with Disabilities

Atlas Tube 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:

- allowing customers with disabilities to be appropriately accommodated 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.

Customers with disabilities are encouraged to request accommodation via their primary contact at EnergeX Tube to reduce or eliminate delays in receiving service.

## B. Assistive Devices

### Customer's own assistive device(s):

Persons with disabilities may choose to use their own assistive devices when accessing goods or services provided by Atlas Tube.

Where the use of such an assistive device presents a safety risk 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 cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring that he/she is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

## C. 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 access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

### Food Service Areas:

A customer with a disability that is accompanied by guide dog 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, as stipulated by the provisions of the *Health Protection and Promotion Act, Ontario Regulation 562 Section 60*.

#### Exclusion Guidelines:

If a guide dog, service animal or service dog is not permitted to be in an area because of a legal exclusion (see applicable laws below) Atlas Tube will offer alternative methods to enable the person with a disability to access goods and services, to the extent that this is practicable.

#### Applicable Laws:

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

#### Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Atlas Tube may request verification from the customer. Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

#### Care and Control of the Animal:

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

#### Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Atlas Tube will make all reasonable efforts to meet the needs of all individuals.

#### D. Support Persons

If a customer with a disability is accompanied by a support person, Atlas Tube will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

#### E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Atlas Tube. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Atlas Tube'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.

##### Notifications will Include:

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
- a description of alternative services or options

##### Notifications Options:

When disruptions occur Atlas Tube will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption;
- contacting customers with appointments;
- verbally notifying customers when they are making an appointment; or
- by any other method that may be reasonable under the circumstances.

## F. Feedback Process

Atlas Tube shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Feedback can be provided by email at [steve.monet@zekelman.com](mailto:steve.monet@zekelman.com). Feedback may also be provided verbally or in writing to:

- Plant Manager – 519-738-5090
- Manager, Human Resources – 519-738-5017

Or in writing to:

- Atlas Tube Human Resources  
200 Clark St., Harrow, ON N0R 1G0

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

## G. Training

Training will be provided to:

- a) all employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Atlas Tube; for example: Human Resources, Metallurgical & Quality Assurance, Customer Service/Sales and third party agents; and,
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

### Training Provisions:

As reflected in *Ontario Regulation 429/07*, 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 *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- 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.
- Atlas Tube's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

#### Training Schedule:

Atlas Tube will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractors who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

#### Record of Training:

Atlas Tube will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

#### H. Notice of Availability and Format of Documents

Atlas Tube shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Atlas Tube, or any other reasonable method.

#### Administration

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

Manager, Human Resources  
Telephone: 519-738-5017  
Mail: 200 Clark St., Harrow, ON N0R  
1G0 Email: [steve.monet@zekelman.com](mailto:steve.monet@zekelman.com)

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

#### **Policy Introduction:**

This new policy has been prepared to bring us into compliance with the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*.