

18 ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

18.1 PURPOSE

- 18.1.1 This policy is intended to meet the requirements of Accessibility Standards for Customer Service, in force in many provinces of Canada, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.
- 18.1.2 Polygon Security Inc. provides goods and services following the principles of dignity, independence, integration and equal opportunity.

18.2 SCOPE OF APPLICATION

- 18.2.1 This policy applies to all employees of Polygon Security Inc. that act on behalf of Polygon Security Inc. towards its customer base, in provinces where this legislation applies.
- 18.2.2 This policy applies to the provision of goods and services at premises owned and operated by Polygon Security Inc.
- 18.2.3 The section of this policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at premises owned and operated by Polygon Security Inc.
- 18.2.4 This policy shall also apply to all persons who participate in the development of the Polygon Security Inc. policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

18.3 REFERENCE DOCUMENTS

- 18.3.1 Accessibility Standards for Customer Service regulations (Ontario, Manitoba and other provinces to come);
- 18.3.2 Charter of Rights and Freedoms;

18.4 DEFINITIONS

- 18.4.1 **Assistive Devices:** 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.
- 18.4.2 Disability:
- 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;
 - An injury or disability for which benefits were claimed or received under a professional or work accident insurance plan.
- 18.4.3 **Guide Dog:** A highly-trained working dog that has been trained to provide mobility, safety and increased independence for people who are blind.
- 18.4.4 **Service Animal:** An animal is a service animal 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 physician or nurse confirming that the person requires the animal for reasons relating to the disability.
- 18.4.5 **Service Dog:** 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.
- 18.4.6 **Support Person:** Person who accompanies a person with a disability in order to help with communication, mobility, personal care, medical needs or access to goods and services.

18.5 GENERAL PRINCIPLES

In accordance with the Accessibility Standards for Customer Service regulations in force, 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 disruptions
- Customer Feedback
- Training
- Notice of Availability and Format of Required Documents

18.5.1 The Provision of Goods and Services to Persons with Disabilities

Polygon Security Inc. makes 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.

18.5.1.1 Assistive Devices

- a. Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Polygon Security Inc. 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.

18.5.1.2 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 the premises unless otherwise excluded by law.

- a. Applicable Laws:

If there is a conflict between a provision of applicable Act or regulations or under any other Act relating to banned breeds (such as Pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

- b. 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, Polygon Security Inc. 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.

- c. 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.

- d. Allergies:

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

18.5.1.3 Support Persons

- a. If a customer with a disability is accompanied by a support person, Polygon Security Inc. 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.
- b. There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations Polygon Security Inc. will make every reasonable attempt to resolve the issue.

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.

18.5.2 Notice in disruptions in Service

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

18.5.2.2 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

18.5.2.3 When disruptions occur, Polygon Security 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 (see [Appendix 1](#)).

18.5.3 Feedback Process

Polygon Security Inc. offers customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process is readily available to all customers and notice of the process is available on our website.

18.5.3.1 Submitting Feedback

- a. Customers can submit feedback to any of our Administrative Assistant, Office Administrator or District Manager. This can be done by phone, email or in person.
- b. Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted. This will be done through the List of continuous improvements in PolyApps. Refer to the Quality Responsible of the office for more details.

18.5.4 Training

In provinces where it is required, training on accessibility measures is provided to the following people:

- All employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Polygon Security Inc.
- Those who are involved in the development and approval of customer service policies, practices and procedures.
- Training will be provided to actual and new employees 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.

18.5.5 Notice of Availability and Format of Documents

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. Information is available on our website.

APPENDIX 1

NOTICE OF DISRUPTION

Dear Valued Customers,

The (insert goods or services that are unavailable) will be out of service for (insert reason for disruption) from (insert appropriate date) until (if known, insert appropriate date).

The following alternative services and options are available:

- (list options)
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We regret any inconvenience this may cause. If you have questions or concerns, please contact (Name, Title, E-mail, telephone).

Thank you for your understanding and patience. We appreciate your business, and look forward to seeing you again soon!

Management