

# **ACCESSIBILITY CUSTOMER SERVICE POLICY**

**POLICY NUMBER: 3364**

## **Policy Summary**

Janssen Inc, Johnson & Johnson Consumer Health, and Johnson & Johnson Medical Devices Companies Canada (Collectively, the “Company”) are committed to providing goods and services in a manner that is accessible for persons with disabilities and in accordance with the principles of dignity, independence, integration and equal opportunity.

## **Policy Details**

This policy generally applies to the provision of goods and services to the public or other third parties by the Company, including without limitation to the provision of goods and services at premises owned or operated by the Company, but does not apply to the goods themselves.

The Company will make reasonable efforts to ensure that:

- Persons with disabilities are provided equal opportunity to obtain, use and benefit from the Company's goods and services;
- Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- The goods and services provided to persons with disabilities are integrated with the provision to others unless an alternative measure is necessary to allow a person with a disability to benefit; the alternative measure may be temporary or permanent;
- Communications with a person with a disability are conducted in a manner that takes the person's disability into account; and,
- Persons with disabilities may use Assistive Devices, Service Animals and Support Persons as is necessary to access the Company's goods and services, subject to applicable laws.

### **1.1 Scope**

This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of the Company, including when the provision of goods and services occurs off Company premises such as in: delivery services, call centres, vendors, drivers, catering and third party marketing agencies. This policy shall also apply to all persons who participate in the development of the Company's policies, practices and procedures governing the provision of goods and services to members of the public or to other third parties.

The section of this policy that addresses the use of Service Animals (including Guide Dogs and Service Dogs) and Support Persons only applies to the provision of goods and services that take place at premises owned or operated by the Company.

This policy is intended to meet the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*. While most provisions apply to the Company's operations across Canada, some requirements, highlighted within this policy, will apply only to the Company's operations within the province of Ontario. In general terms, while the definitions set out above refer to the laws of the Province of Ontario, this policy will be interpreted in a manner consistent with the laws of any other applicable Canadian jurisdictions where the Company carries on its operations.



## 2.0 Communications

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

The Company is committed to providing fully accessible telephone service to our customers and other third parties. We will train staff to communicate over the telephone in clear and plain language and to speak clearly and slowly.

The Company will offer to communicate with customers and other third parties by 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.

Respecting the dignity of persons with disabilities means choosing the right words and putting the person first. For example:

Recommended Terms	Terms to Avoid
Disability	Handicap, handicapped, invalid or impediment
Persons with a disability	The disabled
Intellectual or developmental disability	Mental retardation, mentally retarded, retarded, mentally challenged, idiot, imbecile, moron, simple, mongoloid
Person living with... or person born with...	Suffering, afflicted, victim, stricken
Blind, partial vision, low vision, vision loss (be specific)	Visually impaired, the blind
Deaf, deafened, hard of hearing, hearing loss (be specific)	Mute, dumb
Person with a mobility or physical disability	Crippled, cripple, lame, physically challenged
Mental health disability	Insane, lunatic, maniac, mental, neurotic, psychotic, psycho, deviant, crazy, etc.
Accessible parking or bathrooms	Handicapped parking or bathrooms
Person with epilepsy	An epileptic
Person born with a disability	Birth defect, deformed/deformity, congenital defect
Person who has (a particular condition) or person who has had a stroke	Victim of (a condition such as multiple sclerosis, a stroke, cerebral palsy)
Person with a disability, person who has (a particular condition)	Suffers from, afflicted by, stricken with, etc.
Person with a disability	Physically challenged (Challenges are environmental conditions.)

## 3.0 Assistive Devices

We are committed to serving people with disabilities who use Assistive Devices to obtain, use or benefit from our goods and services. We will ensure that our employees are trained and familiar with various Assistive Devices that may be used by customers with disabilities while accessing our goods or



services.

We will ensure that key employees know how to use the Assistive Devices that are available on our premises for customers (e.g., TTY, chair lifts, elevators, evacuation chairs).

#### **4.0 Use of Service Animals and Support Persons**

We are committed to welcoming people with disabilities who are accompanied by a Service Animal (including a Guide Dog or Service Dog) on the parts of our Company premises that are open to the public and other third parties, subject to applicable laws.

We will also ensure that all employees, volunteers and others dealing with the public 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 Company 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 Company premises.

#### **5.0 Notice of Temporary Disruption**

The Company will provide notice in the event of a planned or unexpected disruption in Company 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 or in such other location(s) as are reasonable in the circumstances.

#### **6.0 Training for Staff**

The Company shall ensure that training is provided to all employees, agents, volunteers and others who deal with the public or other third parties on its behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

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 equipment or Assistive Devices available on Company premises or otherwise that may help with the provision of goods or services to people with disabilities,
- what to do if a person with a disability is having difficulty in accessing the Company's goods and services.

Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

The Company will keep a record of training that includes the dates training was provided and the number of individuals who attended the training. (Training records for Ontario based staff are subject to government audit.)

#### **7.0 Notice of Availability and Format of Documents**

The Company shall notify customers that the documents related to the *Accessibility Standards for Customer Service, Ontario Regulation 429/07* are available upon request and in a format that takes into



account the person's disability.

## 8.0 Customer Feedback Process

Comments or questions regarding the way the Company provides goods and services to people with disabilities can be made in person, by telephone, in writing, by email, suggestion box, feedback card, etc. All feedback regarding this policy will be directed to Human Resources. Individuals providing feedback can expect to hear back within 5 business days, if required. Any complaints will be addressed according to the Company's regular procedures.

## Right to Amend Policy

The Company reserves the right to modify, suspend or terminate this policy at any time. Significant or material changes to this policy may be made at any time by the Company upon providing employees with the minimum notice required by applicable employment standards legislation, if any.

## 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 with hearing, seeing, communicating, moving, breathing, remembering and/or reading.

**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 one of the facilities listed in *Ontario Regulation 58* under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

**Persons with disabilities** are individuals who have a disability as defined above.

**Service Animal**, as referenced in *Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*. 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 their 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.



**Service Dog**, as referenced in *Ontario Regulation 562* under the *Health Protection and Promotion Act*. A dog other than a Guide Dog 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.

**Support Person**, as referenced in *Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*. A support person means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs or access to goods and services.

## **Related Documentation**

N/A

## **Effective Date**

11 JULY 2016

## **Policy Owner**

Employee Relations