



Date of Policy	November 21, 2016	Policy Health & Safety
		OH& S Act

5.26 Integrated Accessibility Standards

Purpose:

Under the *Accessibility for Ontarians with Disabilities Act (AODA), 2005* all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards in the areas of Employment, Information and Communication and Transportation for the Town of Goderich in accordance with Ontario Regulation 191/11 and with the Ministry of Community and Social Services intent to “streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations”. This regulation came into force July 1, 2011.

The requirements set out in this policy and the Integrated Accessibility Regulation (IAR) are not a replacement or a substitution for the requirements established under the *Human Rights Code* nor do the standards or policy limit any obligations owed to persons with disabilities under any other legislation.

Scope and Responsibilities

This policy has been drafted in accordance with the Regulation and addresses how the Town of Goderich will achieve accessibility through meeting the Regulation’s requirements. It provides the overall strategic direction that the Town of Goderich will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the Town’s strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities. (Please refer to By-Law 38 of 2020);
- Training; and other specific requirements under the Information and Communication, Employment and Transportation Standards.

Policy Statement and Organizational Commitment

The Town is committed and guided by the four core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in the *Canadian Charter of Rights and Freedoms, Ontario Human Rights Code, and the Accessibility for Ontarians with Disabilities Act, 2005*. The Town is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. The Town will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disability Act* and Ontario's accessibility laws. The Town shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

Definitions:

“Accessible Formats” may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities;

“Accommodation” means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs;

“Communication Supports” may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications;

“Communications” means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received;

“Conversion Ready” means an electronic or digital format that facilitates conversion into an accessible format;

“Designated Public Sector Organization” means every municipality and every person or organization listed in Column 1 of Table 1 of Ontario Regulation 146/10 (Public Bodies and Commission Public Bodies — Definitions) made under the *Public Service of Ontario Act, 2006*

“IAP” means Individualized Accommodation Plan

“Information” includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

“Internet Website” means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

“Kiosk” means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

“Mobility Aid” means a device used to facilitate the transport, in a seated posture, of a person with a disability.

“Mobility Assistive Device” means a cane, walker, wheelchair, scooter or similar aid.

“New Internet Website” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

“Redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

“Unconvertible” means

- (a) If it is not technically feasible to convert the information or communications;
- (b) The technology to convert the information or communications is not readily available.

“Web Content Accessibility Guidelines” means the world wide web consortium Recommendation entitled “Web Content Accessibility Guidelines (WCAG) 2.0”.

General Provisions

Multi-Year Accessibility Plan

The Town of Goderich is part of the Huron County Accessibility Advisory Committee (HCAAC). Each year, HCAAC updates its Multi-Year Accessibility Plan. Once adopted by Council, the Town will post the information on the Town website and will provide it in alternative formats upon request.

Procuring or Acquiring Goods, Services or Facilities

The Town will use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so (in which case, if requested, will provide an explanation). Please refer to By-Law 38 of 2020.

Self-Service Kiosk

The Town shall have regard to the accessibility for persons with disabilities when designing,

procuring or acquiring self-service kiosks.

Assistive Devices

The Town of Goderich will allow persons with disabilities to use their own personal assistive devices to obtain, use or benefit from the services offered by the Town of Goderich.

Should a person with a disability be unable to access the Town's services through the use of their own personal assistive device, the Town of Goderich will ensure the following measures:

- Determine if service is inaccessible, based upon individual requirements.
- Assess service delivery and potential service options to meet the needs of the individual.
- Notify person with disability of alternative service and how they can access the service, temporarily or on a permanent basis.

Service Animals

For the purpose of this policy, a 'service animal' is defined as either:

- A "guide dog," as defined in section 1 of the Blind Persons Rights' Act; or
- A "service animal" for a person with a disability. For the purpose of this policy, 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 the 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.

The Town of Goderich will allow the person and the animal onto all Town of Goderich owned and operated public facilities that are open to the public, and will ensure that the person is permitted to keep the animal with him or her unless the animal is otherwise excluded by law.

If a service animal is excluded by law from the premises, the provider of goods or services shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the provider's goods or services.

Support Persons

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 or medical needs or with access to goods or services.

The Town of Goderich will allow people with disabilities, who require, to be accompanied by a support person in all Town owned and operated public facilities. The Town of Goderich reserves the right to request the person with a disability be accompanied by a support person, in the event

that it is considered necessary to protect the health and safety of the person with a disability or others on the premises.

The Town of Goderich will waive admission fees for support persons who accompany a person with a disability, into facilities where admission is charged.

The member of public should notify a staff member about the presence of the support person.

If there is confidential information to be disclosed, consent must be received from the person with the disability.

Training

The Town of Goderich is committed to training all staff and volunteers in accessible customer service, other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, the Town of Goderich will train:

- a) Every person who deals with members of the public or other third parties on behalf of the Town, whether the person does so as an employee, agent, volunteer or otherwise.
- b) Every person who participates in developing the Town's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties.

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes the requirements of this Policy and:

- The purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- Town of Goderich policies related to the Customer Service Standards
- How to interact and communicate with persons with various types of disability.
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person
- How to use equipment or devices available on-site or otherwise that may help with the provision of goods or services to a person with a disability.
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

The Town of Goderich trains every employee as soon as practicable after being hired and provides training in respect of any changes to the policies.

The Town of Goderich logs and retains records which record the details of the training provided,

as well as the name of the person(s) and date the training was completed.

The Town of Goderich will customize the training going forward, based on the actual experiences, usage of the persons with disability in Town of Goderich owned or operated facilities and legislative requirements as they come down from the province.

Information and Communication Standard

The Town will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If the Town determines that it is not technically feasible to convert the information or communications or the technology to convert the information or communication is not readily available, we will be obligated to provide the person that requires the information with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

Service Disruption

If, in order to obtain, use or benefit from a provider's goods or services, persons with disabilities usually use particular facilities or services of the provider (for example, elevators) and if there is a temporary disruption in those facilities or services in whole or in part, the Town of Goderich shall give notice of the disruption to the public.

Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternate facilities or services, if any, that are available. Notice will be given by posting the information at a conspicuous place on premises owned or operated by the provider of goods or services, as well as by posting it on the Town of Goderich website.

If the Town of Goderich Website should expect a temporary service disruption, advance notice where possible, shall be provided on the website.

Emergency Information

If the Town prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

Should a member of the public wish to make a complaint regarding the service they have received:

1. The member of the public with the complaint or concern should have a discussion with the staff person at the Town of Goderich who is involved in the situation.
2. Should the discussion not resolve the complaint or the member of the public is uncomfortable discussing the issue with the staff person, the member of the public shall fill out a complaint form. The staff person can assist the member of the public with the complaint form in a manner that takes into consideration their disability.
3. The information to be provided by the member of the public shall include their personal contact information, the date, a description of the complaint, and what the member of the public is requesting in order to resolve the complaint. This information shall be documented on the complaint form.
4. The complaint shall be forwarded to the Supervisor and Senior Management Team member responsible for the department, and the Chief Administrative Officer.
5. The department Supervisor and/or Senior Management Team member of that department will attempt to resolve the complaint in a timely manner.
6. The member of the public will be contacted once a resolution has been reached.

Should a member of the public wish to provide the Town of Goderich with a suggestion on how to improve our service:

1. The member of the public will inform staff member of the suggestion.
2. Staff member will assist member of the public in filling out the suggestion form, should they require assistance.
3. Member of the public will be notified in a timely manner of how the Town of Goderich will proceed with their suggestion.
4. Staff response should include: an explanation of how we will implement the suggestion, a response indicating further investigation or an explanation why we are unable to implement the suggestion.

The Town of Goderich welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns. All feedback including complaints and suggestions shall be recorded on a complaint/comment form, and forwarded to the Department head, Senior Management Team member for that department, and the Chief Administrative Officer. The Town of Goderich ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

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Accessible Formats and Communication Supports

The Town shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities:

- a) Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- b) At a cost that is no more than the regular cost charged to other persons;
- c) Consult with the person making the request and determine suitability of an accessible format or communication support;
- d) Notify the public about the availability of accessible formats and communication supports.

Alternate formats that should be considered by the Town of Goderich and the person with the disability will include, but are not limited to:

Print Requests:

Requests for alternate formats should be honoured in the most practical manner depending on the media chosen, the size and complexity of the document, the quality and source of the documents, the feasibility of the request (including the cost) and the number of documents to be converted. It should be noted that when request for one of these formats is received and deemed feasible, staff should make every attempt to respond to the request in the most practical manner and to the satisfaction of the requestor. If it is determined that the format requested is not feasible, then other alternate methods of providing the information should be explored that will still meet the needs of the requestor (e.g. Audio CD or explaining the information verbally etc.).

- a) Employee receives request from member of the public for alternate format.
- b) Employee fills out alternative format request form.
- c) Forwards request onto the relevant department and the appropriate corporate department;
- d) The department head and the appropriate corporate department determine feasibility;
- e) Proceeds with alternate format request.
- f) If not feasible; contact individual with feasible solution.

ASL Interpreter Request:

- a) Employee receives request from public for ASL Interpreter.
- b) Employee fills out alternative format request form.
- c) Forwards request onto the relevant department and the appropriate corporate department.
- d) The department contacts Canadian Hearing Society to make request.
- e) Once Canadian Hearing Society confirms attendance of ASL Interpreter, the department contacts individual.
- f) If ASL Interpreter is not available, individual will be contacted with an alternate solution.

Feasibility will be determined based upon cost in relation to size of document and time associated with processing document requests.

The time frame attached to the conversion process varies depending on the media chosen, the size, complexity, quality of source documents and number of documents to be converted. Documents shall be returned in a timely manner depending on the factors previously noted.

Conversion shall be processed in-house wherever possible. When a member of the public requests a piece of Town documentation in a multiple format, the department of origin shall be responsible for the cost of the conversion, materials and distribution, not the public requestor.

In-house printing, where possible, should adhere to the CNIB's Clear Print Standards.

Website Accessibility

Internet websites and web content controlled directly by the Town of Goderich or through a contractual relationship that allows for modification of the product shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WSAG) 2.0, at Level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

Public Libraries

- Public Libraries shall provide access to or arrange for the provision of access to accessible materials where they exist;
- Public Libraries shall make information about the availability of accessible materials publicly available and shall provide information in accessible format or with appropriate communication supports, upon request;
- Public Library Boards may provide accessible formats for archival materials, special collections and rare books.

Design of Public Spaces

The Town of Goderich will meet accessibility laws when building or making major changes to public spaces. Our public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like picnic areas
- Outdoor play spaces, like playgrounds
- Accessible off-street parking
- Accessible on-street parking
- Service-related elements like service counters and waiting areas

Employment Standard

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

The Town of Goderich notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. Applicants are notified when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. The Town will consult with the applicants and provide or arrange for suitable accommodation.

The Town notifies successful applicants of policies for accommodating employees with disabilities when making offers of employment. Staff are advised that supports are available for those with disabilities as soon as practicable after they begin their employment. Updated information is also provided to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

The Town will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. The Town will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace

Where needed, the Town will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, the Health and Safety Coordinator will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

The Town will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

Individualized workplace emergency response information will be reviewed:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

In addition to the above, the Town has a written process to develop individual accommodation

plans for employees which is found within this Health and Safety Program. Furthermore, the Town has a written process for employees who have been absent from work due to a disability and may require disability-related accommodations in order to return to work (See Section 5.26 – Return-to-Work Policy).

The Town’s performance management, career development and redeployment processes take into account the accessibility needs of all employees.

Recruitment

The Town shall notify employees and the public about the availability of accommodations for applicants with disabilities:

- During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- If a selected applicant requests an accommodation, the Town shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant’s disability;
- Notify successful applicants of the policies for accommodating employees with disabilities.

Employee Notification

The Town shall inform its employees, volunteers, Co-Op Students and Council members of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to a disability:

- As required to new employees as soon as practicable after they begin their employment;
- Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to a disability.

Accessible Formats

In addition, and where an employee, volunteer, Co-Op Student and Council member with a disability requests, the Town will consult with the employee, volunteer, Co-Op Student and Council member to provide or arrange for the provision of accessible formats and communication supports for:

- information that is needed in order to perform the employees, volunteers, Co-Op Students or Council member’s job/work;
- information that is generally available to employees in the workplace; and
- consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

The Town shall have in place a written process for the development of a documented individual accommodation plan for employees with a disability. Process to include:

- The employee's participation in the development of the IAP;
- Assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- The Town may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- Employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace not from a bargaining agent;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- Identification of any other accommodation that is to be provided.

Return to Work

The Town will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. Such processes must be documented and must outline the steps that the Town will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement, and Redeployment

The Town will take into account the accommodation needs and/or individual accommodation plans of employees when:

- Using performance management processes;
- Providing career development and advancement information;
- Using redeployment procedures.

Workplace Emergency Response Information

The Town shall provide individualized workplace emergency response information to employees who have a disability:

- If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability;
- If the employee who receives an individual workplace emergency response information requires assistance and with the employee’s consent, the Town shall provide the workplace emergency information to the person designated by the Town to provide assistance to the employee;
- As soon as practicable after becoming aware of the need for accommodation due to the employee’s disability;
- And will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

Transportation Standard

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers.

The Town does not have a public transit system, but is responsible for issuing taxi licenses, therefore has obligations under the Transportation Standard.

The Town shall:

- Consult with persons with disabilities and the public to determine proportion of accessible taxicabs required in the community, including steps to meet the need;
- Ensure taxicabs do not charge a higher fare or additional fee to persons with disabilities;
- Ensure taxicabs do not charge a fee for storage of assistive devices;
- Ensure taxicabs have appropriate information displayed both the rear bumper and available in an accessible format to passengers.

Evaluation

An annual review of the policy will be conducted by the JHSC and the Safety Coordinator.

Required Forms

TG21 – Individual Emergency Workplace Response Plan

Appendix C: Memo for Sign-Off by Newly Hired Staff, Volunteers, Co-Op Students or Town Council members – Added November 21, 2016; Revised January 2023

Revision History of this Policy

September 23, 2013 – Complete program revision and re-issue using new format.

November 21, 2016 - Program revision as a result of the Legislature's June 8 changes to the AODA Accessible Customer Service Standard and the Integrated Accessibility Standards. These changes came out of a recommendation from the Standards Development Committee which reviewed the AODA legislation 5 years after it came into effect. The changes came into effect on July 1, 2016 and the policy has now added volunteers, Co-Op Students and Council members to the Training, Employee Notification and Accessible Formats section.

February 2023 – Program revision to include training and feedback processes; employment standards

Standard/Legislation

Accessibility for Ontarians with Disabilities Act

This section of the Health and Safety Program, defined as Section 5.26 “Integrated Accessibility Standards” is publicly available. Accessible formats are available upon request.