



## TOWN OF INNISFIL CORPORATE POLICY

<b>POLICY:</b> <i>Integrated Accessibility Standard Regulation Policy</i>	<b>COUNCIL APPROVAL</b> <b>DATE:</b> September 7, 2016 <b>RES. NO.:</b> CR-175-11.16
<b>POLICY NO.:</b> CP.02-06-16	<b>REVISED DATE:</b> May 22, 2019 <b>RES. NO.:</b> 2019.05.22-CR-01

### 1. PURPOSE:

The Town of Innisfil is commitment to continuous improvement and complying with accessibility guidelines. The Integrated Accessibility Standards Regulation Policy outlines the overall strategic direction that the Town of Innisfil will follow in the identification, removal, and prevention of barriers to persons with disabilities to ensure access to the Town's goods, services, and facilities.

The Town's regulatory compliance with the Integrated Accessibility Standards Regulation (O. Reg. 191/11) of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and all policy requirements under the Regulation.

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### 2. SCOPE/APPLICATION:

This Policy applies to all Town of Innisfil employees, including full-time, part-time, seasonal, student and contract staff, including Members of Council and Volunteer Firefighters. This policy covers all Town owned and operated facilities.

### 3. 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.

**"Barrier"** means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This includes physical, architectural, information or communication, attitudinal or technological barrier, a policy or a practice.

**"Communication support"** may include, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

**"Disability"** covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time. There are physical, mental and learning disabilities, mental disorders, hearing or vision

disabilities, epilepsy, mental health disabilities and addictions, environmental sensitivities, and other conditions.

**“Guide dog”** means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations in the Blind Persons’ Rights Act.

**“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.

**“Planned Service Disruption”** means a scheduled shutdown or closure of a Town facility, program or service which may result in a reduction or change to a service level.

**“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 with access to good, services or facilities.

**“Service animal”** is an animal for a person with a disability if:

- a) The animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- b) The person provides documentation from a regulated health professional as indicated in the Integrated Accessibility Standards Regulation, which confirms that the person requires the animal for reasons relating to the disability.

#### **4. RESPONSIBILITY:**

It is the responsibility of all Town of Innisfil employees and Members of Council to ensure that this policy is adhered to and that the practices of the Town demonstrate a commitment to accessibility as outlined in this policy and accessibility legislation.

#### **5. POLICY STATEMENT:**

The Town of Innisfil is committed to providing persons with disabilities consistent opportunity and access to Town goods, services, and facilities. The Town will ensure that policies, procedures, and practices are provided in a manner that is timely and addresses integration, independence, dignity, and equal opportunity. When communicating with a person with a disability, the Town will do so in a manner that takes into account the person’s disability. The Town will endeavor to follow the compliance schedule of the legislation when implementing each of the requirements addressed in this policy.

#### **6. APPLICATION:**

##### **a) Accessibility Plan**

The Town will establish, implement, maintain, and document a Multi-Year Accessibility Plan that will outline the Town’s strategy to prevent and remove barriers to persons with disabilities and meet the requirements under accessibility legislation. The plan will be established in consultation with the Innisfil Accessibility Advisory Committee (IAAC). Members of the public, including those with disabilities, will be encouraged to provide input into the plan. Town Council will be presented with the plan for review and approval.

The Town will review and update the accessibility plan at least once every five years. As with the initial development of the plan, the IAAC and members of the public will be consulted during the updating of the plan. Council will be presented with the updated plan for review and approval.

The Town will prepare an annual status report, which will outline the progress of measures taken to implement the plan and the Town's strategy to identify, prevent, and remove barriers to those with disabilities. The annual status reports will be presented to the IAAC and Council. The Town will make all accessibility plans and annual status reports available to the public. All plans and reports will be posted on the Town's website and made available at Town facilities upon request. The Town will provide the documents in an accessible format, upon request.

**b) Procuring or Acquiring Goods, Services or Facilities**

The Town will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except when it is not practical to do so. The Town will provide an explanation, upon request, when it has not been practical to incorporate accessibility features.

**c) Self-Service Kiosks**

The Town shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

**d) Training**

The Town of Innisfil will ensure that training is provided on the requirements of accessibility standards, the purpose of the Act, and on the Human Rights Code as it pertains to persons with disabilities. Such training will be provided to: all paid employees and volunteers; all persons who participate in developing Town policies; and all other persons who provide goods, services or facilities on behalf of the Town

The training will also review the requirements of the Customer Services Standards, and instruction about the following:

- 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 the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities 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 good, services or facilities.

The specified training and information will be provided to each person to whom this policy applies as soon as practicable, as well as on an ongoing basis in respect to any changes to the Town's policies, procedures and practices governing the provision of goods, services, and facilities to persons with disabilities.

A record of the training provided, the date of the training and the recipients will be maintained. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act*.

**e) Feedback**

The Town of Innisfil will ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities. The public shall be notified of the availability of accessible formats and communications support by including notice on the Town website, on Town premises and other appropriate locations. Upon request, accessible formats or communication supports will be provided or arranged.

**f) Accessible Formats and Communication Supports**

Upon request, the Town of Innisfil will provide, or arrange for the provision of, accessible formats or communication supports for persons with disabilities.

These accessible formats and communication supports will be provided in a timely manner and in a way that takes into account the individual's accessibility needs due to disability. The Town will consult with the person making the request to determine the suitability of an accessible format or communication support. Such accessible documents and communication supports will be provided at a cost no greater than the regular cost charged to others.

The Town will notify the public about the availability of accessible formats and communication supports, upon request, by including a notice on its website and on many of the documents produced by the Town. If a document, or portions of a document, cannot be converted into an accessible format, the Town will provide an explanation or summary of such information in an accessible format.

**g) Emergency Procedure, Plan or Public Safety Information**

The Town will, upon request, provide emergency procedure, plan and public safety information in an accessible format or with communication support, as soon as practical.

**h) Accessible Websites and Web Content**

The Town will ensure that its external Internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2014 any new web content will conform with WCAG 2.0 Level A. By January 1, 2021 all Internet website and web content will conform with WCAG 2.0 Level AA.

**i) Recruitment, Assessment and Selection**

The Town is committed to equal consideration of candidates during the recruitment, assessment and selection process. Job applicants, including the public and current Town employees, will be notified of the availability of accommodations for persons with disabilities in its application process.

Individuals selected to participate in assessment or selection processes, such as an interview or testing, will be notified of the availability of accommodations, upon request, during such an

assessment or selection process. In cases where accommodations due to disability are requested, the Town will consult with the individual and provide or arrange for suitable accommodations in a manner that takes into account the applicant's disability needs. Accommodations will be provided with respect to the materials or processes used in recruitment.

When making offers of employment, the Town will notify the successful applicant of its policies for accommodating employees with disabilities. This notification will be provided in the Offer of Employment letter.

**j) Informing Employees of Supports**

The Town will inform employees of its policies, and any updates to such policies, used to support employees with disabilities. The Town will provide this information to new employees as soon as practical after commencing employment. This includes policies on providing job accommodations that take into account the employee's accessibility needs due to disability.

**k) Accessible Formats and Communication Supports for Employees**

The Town will, when requested by an employee with a disability, consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is required in order to perform the job, as well as information that is generally available to employees in the workplace. The Town will consult with the employee making the request in determining the suitability of an accessible format or communication support.

**l) Workplace Emergency Response Information**

The Town is committed to ensuring the safety of its employees. Individualized workplace emergency response information will be provided to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the employee's need. This information will be provided as soon as practical after the Town becomes aware of the need for accommodation.

When an employee requires assistance in an emergency, the Town will, with the employee's consent, provide such information to the person designated by the Town to provide assistance. The Town will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs and plans are reviewed, and when the Town reviews its general emergency policies.

**m) Documented Individual Accommodation Plans**

The Town will develop a written process for the development of documented individual accommodation plans for employees with disabilities. The individual accommodation plan will include:

- If requested, any information regarding accessible formats and communication supports provided to the employee;
- If required, individualized workplace emergency response information; and
- Any other accommodations that are to be provided.

**n) Return to Work Process**

The Town will maintain its documented return to work process for employees with a disability and who require disability-related accommodation in order to return to work.

The Town's return to work process will outline the steps the Town will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).

**o) Performance Management, Career Development and Advancement, and Redeployment**

The Town will take into account the accessibility needs of employees with disabilities and any individual accommodation plans when providing any performance management, career development and advancement.

In the event of redeployment (reassigning employees to other departments or jobs within the Town when a particular job or department has been eliminated), the Town will also take into account the employee's accessibility needs due to disability and any individual accommodation plan.

**p) Transportation Standard - Accessible Taxi Cabs**

The Town will consult with the Innisfil Accessibility Advisory Committee, the public and persons with disabilities to determine the proportion of on-demand accessible taxicabs required in the community. The Town will identify progress made toward meeting the need for on-demand accessible taxicabs and will document steps to be taken in the Town's Multi-Year Accessibility Plan.

The Town will ensure that owners and operators of Innisfil taxicabs are prohibited from the following:

- Charging a higher fare or an additional fee for persons with disabilities than that charged for persons without disabilities for the same trip;
- From charging a fee for the storage of mobility aids or mobility assistive devices.

The Town will ensure that owners and operators of taxicabs make available vehicle registration and identification information in an accessible format to persons with disabilities who are passengers as well as placing on the rear bumper of the taxicab.

**q) Use of Service Animals and Support Persons**

Persons with disabilities may enter premises owned and operated by the Town accompanied by their service animal and keep that animal with them when accessing goods, services and facilities provided by the Town, unless the animal is otherwise excluded by legislation (see non-exhaustive list of such legislation under References and Related Documents).

In the event that a service animal is otherwise prohibited by law from the premises, the Town will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from the Town's goods, services and facilities. Where it is not readily apparent that an animal is a Service Animal, Town staff may ask for verification as per legislated

guidelines. Service animals must be supervised by their owners and be kept in control at all times.

Persons with disabilities are permitted to be accompanied by their support person in areas that are open to the public when accessing goods, services and facilities provided by the Town. If a person with a disability is accompanied by a support person, the provider of goods, services and facilities shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

The Town may require a person with a disability to be accompanied by a support person while using Town premises in situations where it is necessary to protect the health or safety of the person with a disability or the health or safety of others, and if there is no other reasonable way to protect the health or safety of the person with a disability or the health or safety of others. The Town will consult with the person with a disability and consider the available evidence to determine if the person with a disability is required to be accompanied by a support person.

A support person, when assisting a person with a disability to obtain, use or benefit from the Town's goods, services or facilities, will be permitted to attend at no charge where an admission fee is applicable; however, where it is beyond the control of the Town to waive the fee, advance written notice of the fee will be provided. In situations where the Town requires a person with a disability to be accompanied by a support person, any fee or payment will be waived with respect to the support person's admission to the premises or in connection with the support person's presence on the premises.

**r) Notice of Temporary Disruptions**

In the event of a planned service disruption to goods, services, or facilities the Town of Innisfil will provide notice of the disruption in advance.

The notice will include information about the reason for the disruption, its anticipated duration and a description of alternative good, services, or facilities that may be available.

Notice may be given by posting the information in visible places, on the Town's website or by such other method or means as is reasonable under the circumstances.

In the event of an unexpected disruption, the Town shall provide notice as soon as possible.

**s) Feedback Process**

In an effort to improve on the provision of Town goods and services to persons with disabilities, feedback from the public is welcomed. To assist with the collection of feedback, the Town will accept comments in any form (in person, electronic format, written, etc). All such feedback will be logged and all questions and concerns shall be acknowledged within the customer service guidelines set by the Town. Response time to the feedback will depend on the issue, but will not exceed 15 business days unless there are extenuating circumstances.

Complaints regarding the accessibility issues shall be forwarded to IAAC for review and discussion. The Committee will then forward its recommendations to the appropriate department for consideration.

Information on the feedback process will be readily available to the public through postings on Town premises, the Town website and other appropriate locations.

**t) Format of Documents**

The Town shall notify the public that the documents required by the Integrated Accessibility Standards (Ontario Regulation 191/11) and the Town's Integrated Accessibility Standard Regulation Policy, procedures, notices of temporary disruptions, training records are available upon request, subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Notice of the availability of documents may be given by posting the information in conspicuous places owned and/or operated by the Town of Innisfil, the Town's website and/or any other reasonable method.

When communicating with a person with a disability, the Town will do so in a manner that takes into account the person's disability. The Town and the person with a disability will agree on what format will be used. The document or information will be provided to the person in an accessible format or with communication support in a timely manner and at a cost that is no more than the regular cost charged.

**7. REFERENCES AND RELATED DOCUMENTS**

- *Ontarians with Disabilities Act, 2001*
- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation*
- *Ontario Human Rights Code*
- *Town of Innisfil Annual Accessibility Plan*
- *Other Accessibility Standards as approved into Regulation*