

**AODA – Integrated
Accessibility Standards Policy**

Applies to: All staff

**Effective date:
February 2015**



**CLERKS
DEPARTMENT**

**POLICY NUMBER:
ACC2015-01**

Policy Statement

The Town of Collingwood is committed to providing persons with disabilities consistent opportunity and access to all Town goods, services and facilities while ensuring that policies, procedures and practices are provided in a timely manner and address integration, independence, dignity and equal opportunity.

This policy has been developed to help guide the Town of Collingwood in achieving accessibility through meeting its legislative requirements of the Integrated Accessibility Standards Regulation 191/11 (IASR) developed under the Accessibility for Ontarians with Disabilities Act 2005 (AODA). All Collingwood Departments will also continue to monitor their existing and new policies and procedures to ensure that accessibility is incorporated as appropriate.

1. DEFINITIONS

“AODA” refers to the Accessibility for Ontarians with Disabilities Act, 2005.

“IASR” refers to Ontario Regulation 191/11 Integrated Accessibility Standards Regulation

“Disability” refers to any of the following as per The Ontario Human Rights Code:

1. 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;
2. a condition of mental impairment or a developmental disability;
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
4. a mental disorder; or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

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

“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.

“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.

“Performance Management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

“Career Development and Advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may provide higher pay, greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.

“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 by the organization.

2. PURPOSE

The purpose of this policy is to meet the regulatory requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) Regulation 191/11.

3. SCOPE

This policy applies to all Town of Collingwood employees.

4. PROCEDURES

4.1 GENERAL REQUIREMENTS

4.1.1 Establishment of Accessibility Policies

As per the regulation the Town of Collingwood shall develop, implement and maintain policies governing how the Town will achieve accessibility through meeting its requirements under Regulation 191/11. This policy provides an overview of the Town’s commitment to meeting the requirements of the IASR. However Town Departments will also monitor all existing and new policies and procedures to incorporate accessibility as appropriate.

4.1.2 Accessibility Plans

The Town of Collingwood has developed a multi-year accessibility plan which meets the requirements of Regulation 191/11 and outlines its long term strategy of preventing and removing barriers for people with disabilities. The plan is posted on the Town’s website and is available in an accessible format upon request. An annual summary of progress will be posted on the website at the beginning of each calendar year. A comprehensive review and update of the plan will occur, at a minimum, once every five years.

4.1.3 Procurement of Goods, Services or Facilities

The Town of Collingwood will incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities. An accessible procurement policy has been developed and the current Purchasing By-law will be amended to include an accessible procurement statement.

Should the Town determine that it is not practicable to incorporate accessible design, criteria or features when procuring for goods, services or facilities, it shall provide, upon request, provide an explanation.

4.1.4 Self Service Kiosks

The Town of Collingwood shall ensure that accessibility features are incorporated when designing, procuring or acquiring self-service kiosks.

4.1.5 Training

Training on the requirements of the Accessibility Standards referred to in Regulation 191/11 and on the Human Rights Code as it pertains to persons with disabilities shall be provided to the following:

- All employees and volunteers
- All persons who participate in developing the Town's policies (i.e. council and committee members)
- All other persons who provide goods, services or facilities on behalf of the Town

Training received will be appropriate to the duties of the employees, volunteers and other persons and shall be implemented as soon as practicable on an ongoing basis. In addition, all new employees will receive this training during their Employee Orientation. The Town will ensure that a record of training will be kept and will include the date of completion as well as the number of individuals who participated in the training. A schedule for refresh training will be developed for Town Employees. A statement will be included on procurement contracts to ensure that organizations hired by the Town are in compliance with the training requirements under the AODA.

4.2 INFORMATION AND COMMUNICATIONS STANDARD

4.2.1 Feedback

The Town has developed a Barrier Complaint Form and an Accessible Customer Service Feedback Form which are posted on the Town website. In addition, all Departments monitor their feedback processes to include feedback on accessibility as appropriate. The Town is committed to responding to feedback from the public in a timely way and shall ensure that the process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.

The Town shall notify the public on its website about the availability of accessible formats and communication supports.

4.2.2 Accessible Formats and Communication Supports

The Town shall provide or arrange for, upon request, unless otherwise stated by the AODA, the provision of accessible formats and communication supports for persons with disabilities in a

timely manner and at a cost that is no more than the regular cost charged to other persons. When providing accessible formats and communication supports, the Town shall consult with the person making the request and take into account the person's accommodation needs.

4.2.3 Emergency Information

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

4.2.4 Accessible Websites and Web Content

The Town of Collingwood shall ensure its websites and web content currently meet the requirements of and conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A and will meet the requirements of Level AA by January 1, 2021.

4.2.5 Public Libraries

The Library Board will make accessible materials available where they exist and will make information about the availability of accessible materials available to the public. It will provide this information in accessible formats or with appropriate communication supports on request. If possible, the Library Board may provide archival material, rare books and special collections in accessible formats. The Collingwood Library has its own Accessibility Coordinator and accessibility page on the Town website.

4.3 EMPLOYMENT STANDARD

4.3.1 Employee Recruitment, Assessment and Selection Process

The Town of Collingwood shall ensure that all employees and the public are notified about the following policies and procedures in relation to recruitment, assessment, selection and job accommodation:

1. About the availability of accommodation for applicants with disabilities in its recruitment processes.
2. During the recruitment process the Town of Collingwood shall inform job applicants selected for an interview that accommodations are available upon request in relation to the materials and process to be used in the interview.
3. When making an offer of employment, the Town will notify the successful applicant of its policies for accommodating employees with disabilities.
4. The Town shall inform its employees 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 disability.
5. The Town shall provide the information required to new employees as soon as practicable after they begin their employment.
6. The Town shall provide updated information to its employees 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 disability.
7. The Town shall consult with the employee, upon request, regarding the provision of or arrangement for accessible formats and communication supports for:
 - a. Information that is required in order to perform the employee's job
 - b. Information that is generally available to employees in the workplace

4.3.2 Workplace Emergency Response Information

The Town of Collingwood shall ensure that employees with disabilities are provided with individualized workplace emergency response information, if the disability is such that the accommodation is necessary and the Town is aware of the need for accommodation.

In addition, if an employee who receives individualized workplace emergency response information requires assistance, the Town shall, with the employee's consent, provide the emergency response information to the person designated by the Town to provide assistance to the employee.

The Town shall provide this information as soon as practicable after the Town becomes aware of the need for accommodation.

All individualized workplace emergency response information shall be reviewed when:

- (a) the employee moves to a different location in the organization
- (b) the employee's overall accommodation needs or plans are reviewed
- (c) the Town reviews its general emergency response policies

4.3.3 Documented Individual Accommodation Plans

The Town of Collingwood will develop documented individual accommodation plans upon request with employees with disabilities. The process for developing the documented individual accommodation plans shall adhere to and include the following:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If all or part of an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

In addition documented individual accommodation plans shall:

1. If requested, include any information regarding accessible formats and communications supports provided
2. If required, include individualized workplace emergency response information
3. Identify any other accommodation that is to be provided.

4.3.4 Return to Work Process

The Town of Collingwood shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability related accommodations in order to return to work. The process shall be documented and shall outline the steps the Town will take to facilitate the return to work of employees who were absent because their disability required them to be away from work. Documented Individual Accommodation Plans are to be used as part of the process.

4.3.5 Performance Management

Town of Collingwood shall take into account the accessibility needs of employees with disabilities, as well as Documented Individual Accommodation Plans, when using its performance management process in respect of employees with disabilities.

4.3.6 Career Development, Advancement and Redeployment

When implementing career development, advancement or redeployment the Town of Collingwood shall take into account the accessibility needs of its employees with disabilities as well as any Documented Individual Accommodation Plans.

4.4 TRANSPORTATION STANDARD

The requirements in the Transportation Standard will help the Town of Collingwood continue to provide accessible services and vehicles to people with disabilities, as well as visitors, families with strollers and seniors.

The Town is committed to providing accessible transit services through both its conventional and specialized transit service operated by contracted service providers. The Town of Collingwood shall ensure the contracted service providers are in full compliance with the AODA and shall review AODA contract requirements and standards with the contractors upon renewal.

In order to comply with the Transportation Standard the Town of Collingwood shall:

4.4.1 Duties of Municipalities – General:

- Consult with the Collingwood Accessibility Advisory Committee (CAAC), the public and persons with disabilities in the development of accessible design criteria to be considered in the construction, renovation or replacement of bus stops and shelters; and
- Identify planning for accessible bus stops and shelters, including any steps that will be taken to meet the goal of accessible bus stops and shelters, in its accessibility plan
- Regularly monitor and confirm that its contracted service providers for both conventional and specialized transit service are in compliance with all the requirements of the Accessible Transportation Standard.

4.4.2 Duties of Municipalities – Accessible Taxicabs:

- Consult with the Collingwood Accessibility Committee (CAAC), the public and persons with disabilities to determine the proportion of on-demand accessible taxicabs required in the community; and
- Town of Collingwood shall identify the progress made toward meeting the need for on-demand accessible taxicabs, including any steps required to meet the need, in its accessibility multi-year accessibility plan.

4.4.3 Duties of Municipalities – Taxicabs

The Town shall ensure that owners and operators of taxicabs are prohibited:

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

The Town shall ensure that owners and operators of taxicabs:

- Place vehicle registration and identification information on the rear bumper of the taxicab; and
- Make available vehicle registration and identification information in an accessible format to persons with disabilities who are passengers.

4.5 DESIGN OF PUBLIC SPACES

The standard for the design of public spaces applies only to new construction and major changes to existing features. The standard covers the following:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, such as playgrounds
- Outdoor paths of travel, such as sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals
- Accessible parking (on and off street)
- Service-related elements like service counters, fixed queuing lines and waiting areas
- Maintenance and restoration of public spaces

The Town of Collingwood will continue to work towards meeting accessible design criteria and features in its outdoor public spaces and will ensure the appropriate departments adhere to requirements under the regulation, ensuring that all requirements for consultations with the public and persons with disabilities and the Collingwood Accessibility Advisory Committee are undertaken in a timely and transparent manner.

5. GENERAL

The Town of Collingwood is responsible for complying with Ontario Regulation 191/11 Integrated Accessibility Standards and ensuring the associated policies and procedures are implemented by the appropriate department(s).