



# Corporate Accessibility Policy

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<b>Applies to:</b>	All Staff
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## 1. 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 and address integration, independence, dignity, and equal opportunity.

The Town of Collingwood recognizes the diverse needs of all our residents and customers and will respond by striving to provide services and facilities that are accessible to all. The Town of Collingwood is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

All Departments will also continue to monitor their existing and new policies and procedures to ensure that an accessibility lens is incorporated as appropriate considering physical, information/communication, technology, organizational and attitudinal barriers.

## 2. Purpose

The purpose of this policy is to address the accessibility requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation 191/11.

This policy is intended to provide the overarching framework to guide the review, development and delivery of goods, services, programs, and facilities by the Town of Collingwood in an inclusive manner that takes into account the needs of people with disabilities.

## 3. Definitions

- **Accessibility:** a concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political, and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and also refers to design characteristics of products, devices, information, services, facilities or

- public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.
- **Accessible:** refers to products, devices, information, services, facilities or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both “direct access” (i.e. unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.
  - **Accessible formats:** refers to formats that are usable by persons with disabilities including but not limited to: large print, recorded audio and electronic formats, and braille.
  - **Accommodation:** in the context of Human Rights, accommodation means preventing and removing barriers caused by attitudinal, systemic, physical, information or communications, and technology barriers that unfairly exclude individuals or groups protected by Ontario’s Human Rights Code from having equal access to full benefits available to others. Principles of accommodation include dignity, individualization and inclusion or integration.
  - **AODA:** refers to the Accessibility for Ontarians with Disabilities Act, 2005.
  - **Assistive Device:** refers to an auxiliary aid such as communication aid, cognition aid, personal mobility aid or medical aid.
  - **Barrier:** defined by the AODA as anything that prevents a person with a disability from fully participating in all aspects of society because of a disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.
  - **Communications:** refers to interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.
  - **Communications Supports:** includes, but is not limited to, captioning, alternative and augmentative communications supports, plain language, sign language and other support that facilitates effective communications.
  - **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

- **Goods, Services and Facilities:** all aspects of the Town as an employer and service provider, including: the delivery of goods, services, and programs, all information and communication including verbal, print, audio, video, websites, web applications and web content, and other digital technologies including kiosks, and all buildings, facilities, public spaces, and the public realm.
- **IASR:** refers to Ontario Regulation 191/11 Integrated Accessibility Standards Regulation
- **Performance Management:** means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- **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.
- **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.
- **Service Animal:** as defined by the AODA Customer Service Standards, an animal is a service animal for a person with a disability if 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 the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.
- **Support Person:** an individual who accompanies a person with a disability to help with communication, mobility, personal care, or medical needs or with access to goods or services.

#### 4. Scope

This policy applies to all Town of Collingwood members of Council, employees and volunteers.

#### 5. Principles of the Policy

Town of Collingwood goods, services and facilities are available to people with disabilities in a manner that:

- Is free from discrimination;
- Strives at all times to respect the individual's dignity and independence;
- Seeks to provide integrated services;
- Takes individual needs into account, to ensure that there are no barriers to access or participation, and that individuals with disabilities are treated equitably.

## **6. Roles and Responsibilities**

Accessibility is a shared responsibility. Town council, staff and volunteers are responsible for adhering to the parameters of this policy and for ensuring the needs of people with disabilities are addressed in goods, services, programs, and facilities.

- Customer and Corporate Services is responsible for reviewing this Policy annually and recommending amendments to ensure on-gong compliance with regulated accessibility standards and legislated obligations.
- Customer and Corporate Services shall provide advice and direction on the implementation of the Policy.

## **7. Policy**

### **7.1 General Requirements**

#### **7.1.1 Accessibility Advisory Committee**

The Town of Collingwood has established an Accessibility Advisory Committee (AAC) with the majority of members of the committee whom are persons with disabilities.

The committee shall advise and assist the Town on matters, issues and policies pertaining to accessibility for persons with disabilities. The AAC shall also advise the Town of Collingwood Council on the requirements and implementation of accessibility standards, preparation of accessibility reports, review of site plans and drawings for buildings and facilities, and provide advice on policies, practices, and procedures on providing goods and services to persons with disabilities.

#### **7.1.2 Accessibility Plans**

The Town of Collingwood has developed a multi-year accessibility plan which 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.

#### **7.1.4 Procurement of Goods, Services or Facilities**

The Town of Collingwood will incorporate accessible design, criteria and features when procuring or acquiring goods, services, or facilities. 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 an explanation upon request.

#### **7.1.5 Self Service Kiosks**

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

### **7.1.6 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.

## **7.2 Information and Communication Standard**

### **7.2.1 Feedback**

The Town has developed a Barrier Feedback Form and an Accessible Customer Service Feedback Form which are posted on the Town website. In addition, all Departments will 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 manner 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.

### **7.2.2 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 consider the person's accommodation needs. When it is not practicable to provide an accessible format, the Town will provide an explanation and a summary of the document in an accessible format.

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

This requirement applies to Town information, communications, documents, and emergency procedures, plans or public safety information made available to the public.

### **7.2.3 Emergency Information**

The Town shall provide all existing emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports as soon as practicable, upon request.

### **7.2.4 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 AA in accordance with the schedule set out in the Integrated Accessibility Standards Regulations, Section 14.

Town departments that manage their content on the website are responsible for ensuring accessibility based on approved procedures, standards, and guidelines.

Staff shall refer to the Corporate Style Guide for current instructions on how to create Accessible Documents and Writing Style & Clear Print Guidelines.

### **7.2.5 Public Libraries**

The Library Board will make accessible materials available where possible and will make information about the availability of accessible materials publicly available. It will provide this information in accessible formats or with appropriate communication supports on request. The Collingwood Library has its own Accessibility Coordinator and accessibility page on its website.

### **7.3 Employment Standard**

#### **7.3.1 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 consider 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 consider 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

#### **7.3.2 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.

### **7.3.3 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 way 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 way 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 way 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 way it will be done.
7. If all or part of an individual accommodation plan is denied, the way the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that considers 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.



#### **7.3.4 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.

#### **7.3.5 Performance Management**

The Town shall consider 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.

#### **7.3.6 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.

### **7.4 Transportation Standard**

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.

To comply with the Transportation Standard the Town of Collingwood shall:

#### **7.4.1 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 follow all the requirements of the Accessible Transportation Standard.

- Ensure non-functioning accessibility equipment is repaired as soon as possible and people with disabilities are accommodated
- Appropriately accommodate people with disabilities in areas of fares, fare parity, storage of mobility aids, priority seating, service disruptions, pre-boarding and on-boarding announcements, availability of information on accessible equipment, emergency preparedness and response policies, general responsibilities (deploying lift devices, ramps, safe boarding time), technical requirements of vehicles (grab bars, floors and carpeted surfaces, allocated mobility aid spaces, stop-requests and emergency response controls, lighting features, signage, lifting devices, steps, indicators and alarms).

#### **7.4.2 Duties of Municipalities – Accessible Taxicabs:**

- Consult with the Accessibility Advisory Committee, 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.

### **7.5 Design of Public Spaces**

In addition to other legislative requirements (i.e. Ontario Building Code) the Town will comply with the Design of Public Spaces Standard when undertaking 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 Accessibility Advisory Committee are undertaken in a timely and transparent manner. Procedures for preventative and emergency

maintenance and temporary disruptions of accessible elements in public spaces will be developed and implemented.

## **7.6 Customer Service**

The Town of Collingwood will strive for excellence in serving all customers including people with disabilities and is committed to meeting obligations under the Ontario Human Rights Code and the AODA.

### **7.6.1 Assistive Devices**

Town employees, volunteers and third-party contactors shall accommodate the use of personal assistive devices.

Where applicable assistive devices owned and operated by the Town will be made available for use by persons with disabilities and will be kept in good working order. Staff where applicable will be trained in the application and use of the device.

If a person with a disability is unable to access the Town's services using their own assistive devices, the Town will work with the customer to determine alternate means for accessing services.

### **7.6.2 Notice of Service Disruptions**

The Town will give notice of any temporary planned or unplanned service disruption of facilities, services or goods used by persons with disabilities.

A service disruption can include not only closure of facilities, but any disruption that will make it difficult for all people to access goods, facilities, or services.

Notice of the disruption including the reason for the disruption, its anticipated duration, and a description of alternative facilities, if any, that are available will be posted in a conspicuous place at the affected premises and/or on the Town website or by other methods where is reasonable under the circumstances.

Staff shall refer to the Notice of Service Disruption procedure for current instructions on notification process.

### **7.6.3 Service Animals**

Persons with disabilities accompanied by their service animal are permitted to keep the animal with them in premises that members of the public are permitted to enter unless the animal is excluded by law from the premise. The reason why the animal is excluded will be explained to the person with the disability and other reasonable arrangements to provide

goods and services will be explored with the assistance of the person with the disability.

A person with a disability is responsible for the control of their service animal at all times. If the service animal is not kept under control (jumping on people, biting, or other harmful behaviour), the service animal may be required to leave the premises. Other reasonable arrangements to provide goods and services will be explored with the assistance of the person with the disability.

#### **7.6.4 Support Persons**

Where a person with a disability is accessing Town goods, services, or facilities is accompanied by a support person, the Town will ensure that both persons are permitted to enter the premises together and the person with the disability is not prevented from having access to the support person while on the premises.

The Town may require a support person to accompany a person with a disability for reasons of health and safety, either for the person with a disability or other on the premises, this will occur after consulting with the person and it is determined that based on the person's needs and available evidence:

1. A support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises, and
2. There is no reasonable way to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Where this is required, the person with the disability may be requested to make arrangements for (and cover the costs) for a support person.

#### **7.6.5 Fares and Fees**

Persons with disabilities may not be charged more to access Town programs or services.

If the Town charges an admission fee or fare for accessing goods, services, or facilities in connection with a support person, the Town will provide information in advance about the amount, if any, that is payable by the support person accompanying a person with a disability.

If the Town requires a support person to accompany an individual for health and safety reasons, any applicable admission fees or fares will be waived for the support person.

## **8. References and Related Documents**

[Accessibility for Ontarians with Disabilities Act \(AODA\), 2005, S.O. 2005, c.11 \(AODA\)](#)

[Integrated Accessibility Standards Regulation, O. Reg. 191/11](#)

[Ontario Human Rights Code, R.S.O. 1990, c.H. 19](#)

[Ontario Building Code, O. Reg. 332/12](#)

[Ontarians with Disability Act, 2001 \(ODA\)](#)

Notice of Service Disruption Process Procedure

Accessible Communications Policy

Accessible Documents Procedure

Corporate Style Guide

## **9. Consequences of Non-Compliance**

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal. The Town's failure to comply with the AODA may result in significant fines and reputational damage.

## **10. Review Cycle**

This Policy annually and recommending amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.