

# The Corporation of the Township of Georgian Bluffs

## By-law Number 2023-074

Being a By-law to adopt a policy for Integrated Accessibility Standards Policy and repeal By-law 4-2010.

**Whereas** Regulation 191/11: Integrated Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) requires that the Township, as a public sector organization with over fifty employees, create written and publicly available accessibility policies; and

**Whereas** the Corporation of the Township of Georgian Bluffs is committed to providing, to the greatest extent possible, municipal policies, services, programs and facilities that are accessible to residents, ratepayers, and visitors of all abilities;

**Now Therefore** the Council of the Corporation of the Township of Georgian Bluffs enacts as follows:

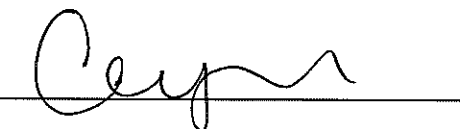
1. That policy LEG-01-23 – Integrated Accessibility Standards Policy, attached hereto as Schedule “A” to the By-law, is hereby adopted.
2. That By-law 4-2010 is repealed.
3. That this By-law shall come into force and effect upon being passed by Council.

Read a first and second time this 8th day of November, 2023.

Read a third time and finally passed this 8th day of November, 2023.



Mayor – Sue Carleton



Acting Clerk – Carly Craig



## Policy LEG-01-2023

# Integrated Accessibility Standards Policy

**Implemented:** November 2023

**Revision Date:** N/A

**References and Related Documents:** *Accessibility for Ontarians with Disabilities Act, 2005* and Integrated Accessibility Standards Regulation 191/11, Accessible Feedback Form

**This document is public and available in an accessible format upon request.**

## Policy Statement

The Township is committed to ensuring equal access and participation for persons with disabilities. We are committed to treating persons with disabilities with respect and access to resources and services in a way that allows them to with maintain independence and dignity. The Township is committed to providing support to its employees and will apply these principles when working with staff requiring accommodation.

The Township believes in integration and is committed to meeting the needs of persons with disabilities in a timely manner, through the implementation of this policy in accordance with the spirit and intent of all applicable legislation and associated regulations including the *Accessibility for Ontarians with Disabilities Act, 2005*, the Ontario Human Rights Code, and the Occupational Health and Safety Act. The Township is committed to removing and preventing barriers to accessibility by meeting the requirements of Ontario's accessibility legislation.

## Purpose and Scope

Regulation 191/11: Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) requires that the Township, as a public sector organization with over fifty employees, create written and publicly available accessibility policies. These policies are formal rules put in place by the Township to achieve accessibility goals and ties in with the Township's Multi-Year Accessibility Plan.



*Where there is a conflict between this policy and the AODA and O Reg. 191/11, the AODA legislative standards shall apply.*

## **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” an arrangement made, or assistance provided to a person requiring assistance to enable them to participate.

“Communications” an exchange between two or more persons where information is given or received.

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

“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, or similar aid.

## **Policy Requirements**

### **1.0 Training**

We are committed to training all staff and volunteers in accessible customer service, accessibility standards, and aspects of the Ontario Human Rights Code that apply to persons with disabilities.

In addition, we will train:

- a) Persons who are involved in developing the Township’s policies (including Township Council, Boards and Committees); and
- b) Persons who provide goods, services, or facilities on behalf of the organization.

Training of employees and volunteers shall be specific and appropriate to their roles. This training shall include:



- The purpose of the AODA and the requirements of customer service standards.
- Our policies related to the Customer Service Standards
- How to interact and communicate with people with several types of disabilities.
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- What to do is a person with a disability is having difficulty accessing the Township's facilities, goods, or services.
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities. These include:
  - Automatic Door Openers
  - Elevators
  - Wheelchairs
  - Chair lifts

At minimum, all employees, including full-time, part-time and contract, are required upon hiring to be trained in AODA. Training will be provided through HR Downloads. All employees will take the AODA Customer Service Standards course and Understanding Human Rights Training (AODA edition) course within their first week of employment. These courses are described below:

#### AODA Customer Services Standards Training Course

This course provides an in-depth review of the legislative requirements under the AODA. This course is intended for workers and leaders in Ontario in a customer service or public-facing role who need to learn about and incorporate accessibility standards under AODA to their organization.

During this course, workers and leaders learn about customer service standards for those with disabilities, several types of disabilities, and many ways to assist and provide aid to those with certain types of disabilities. This course also explores ways to improve customer service principles and skills by examining ways to lessen barriers for those with disabilities.



Learning outcomes at the end of the course include:

- Thoroughly explores accessibility standards and the responsibilities individuals and organizations have under the AODA.
- Teaches how to improve essential customer service skills by explaining different types of disabilities and showing how to interact and communicate with individuals with various disabilities.
- Discusses ways to help those with disabilities overcome accessibility challenges that may occur in an organization's programs, services, or facilities.

#### Understand Human Rights Training (AODA Edition)

This course explains how the Human Rights Code and the AODA work together to protect people with disabilities from discrimination and ensure they can participate fully and equally in society. This training course is intended for individuals working in Ontario, including employers, managers, employees, and volunteers.

This course discusses how the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005 work together to provide equality and accessibility for all Ontarians. Human rights and accessibility requirements are inextricably linked to make society accessible to people with disabilities.

Learning outcomes at the end of the course include:

- Understand requirements under the Human Rights Code and Accessibility for Ontarians with Disabilities Act, 2005 related to discrimination, disability, and accommodation.
- Be aware of different forms of disabilities and discrimination.
- Understand the duty to accommodate individuals with disabilities.

The Township shall also train staff internally in the following areas on an annual basis:

- Creating Accessible Documents/Making Information Accessible
- Providing Accessible Customer Service



## 2.0 Assistive Devices

Persons with disabilities are welcomed and encouraged to use their own assistive devices when accessing services, goods, or using the Township's facilities.

In cases where an assisted device presents a significant/unavoidable health or safety concern, it may not be permitted. Other measures will be used to ensure the person with a disability can access Township services or facilities. Other measures will be determined as appropriate with the individual.

The Township will ensure that staff are trained and familiar with assistive devices we have onsite or that we provide, and may be used by persons with disabilities when accessing services and using facilities.

## 3.0 Service Animals

The Township welcomes people with disabilities and service animals. Service animals are permitted in all facilities that are open to the public.

A service animal may be easily identifiable if it wears a vest or harness or can be observed assisting an individual perform tasks. When it cannot be easily identified that the animal is a service animal, staff may ask to see documentation (i.e. letter or form) from a regulated health professional confirming that the person requires a service animal. A regulated health professional is a member of any of the following:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario



If service animals are not permitted by any other law, to ensure the person can access our services and facilities, the Township will:

- Explain why the animal is not permitted.
- Determine another way to provide access to services and facilities with the customer.

The Township does not prohibit service animals from any public space or facility.

#### 4.0 Support Persons

A person with a disability who is accompanied by a support person is permitted to accompany them to all public spaces and facilities.

If a fee or fare is normally charged to a person accessing services or facilities, a fee/fare will not be charged for support persons.

We will notify persons of this by posting a notice at the following locations:

- Township Administrative Building
- Shallow Lake Community Centre
- Derby Community Centre
- Kemble Community Centre

The Township may in certain cases require that a person with a disability be accompanied by a support person for the safety of the person with a disability or others on the premises. Before deciding, the Township shall:

- Consult with the person with a disability to understand their needs
- Consider health or safety reasons based on available evidence
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

If the Township requires a support person accompany the person with a disability, a fee/fare will not be charged.

#### 5.0 Notice of Temporary Disruption

Where a planned or unexpected disruption occurs to services or facilities for customers with disabilities, the Township will promptly notify customers. The notice will be posted clearly and include information about:



- The reason for the disruption
- The length of time of the disruption
- Description of alternative services or facilities if available

Impacted Services/Facilities include:

- Township Administration Building
- Shallow Lake Community Centre
- Derby Community Centre
- Kemble Community Centre
- Balmy Beach Tennis Court
- Sarawak Family Park
- Cedar Hill Park
- Centennial Park

## 6.0 Feedback Process

The Township of Georgian Bluffs welcomes feedback on how we provide accessible customer service. Feedback from customers will help the Township identify concerns and address barriers.

Feedback may be provided in the following ways:

- Feedback form embedded on the Township's Accessibility webpage or on any page on the Township's website
- Feedback form via Microsoft Word Document available for download on the Township's Accessibility webpage
- Feedback Form available via printed paper copy available at the Township Administration Building
- The Township's Contact GB webform and concern portal

Customers can expect to receive a response within three (3) business days.

The Township is committed to ensuring the feedback process is accessible to persons with disabilities by providing or arranging accessible formats and communication supports, upon request.





## 7.0 Notice of Availability of Documents

The Township shall notify the public that all documents (where possible) are available upon request in an accessible format by posting a notice in the following locations/methods:

- Township of Georgian Bluffs Website
- At the top of all Township produced documents, reports, Council Agendas and Minutes
- Administration desk at the Township Administration Building

The Township shall require that all consultants preparing documentation for public view create and provide the documents in an accessible format.

The Township will provide these documents in an accessible format or with communication support on request. We will consult with the requestor to determine the suitability of the format or communication support. The accessible format shall be provided in a timely manner and without cost.

## 8.0 Self-Service Kiosks

The Township will ensure that all self-service kiosks (iPads/Tablets) have accessibility features enabled. We will incorporate and consider accessibility for persons with disabilities when acquiring, procuring, or designing self-service kiosks.

## 9.0 Procurement

We incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities, including self-service kiosks. In cases where this is not practical, we will provide an explanation upon request.

The Township shall require that all procured goods and services comply with the Township's standards for accessibility and require that they be trained in requirements of the AODA. This shall include but not be limited to the requirement that documents provided to the Township shall be in an accessible format, service providers who will be interacting with the public take accessible customer service training, training or expertise in the built environment standard in O.Reg 191/11.



## 10.0 Information and Communications

The Township will approach communications with people with disabilities in ways that consider their disability. They may include:

- Verbal
- Written
- Or in accessible formats such as:
  - Large print
  - Recorded audio
  - Electronic formats compatible with screen readers (Accessible Word and PDF)

We work with the person with disabilities to determine what method of communication works best for them.

The Township has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in methods that take their disability into account. When requested, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) In a timely manner, considering the person's accessibility needs due to their disability; and
- b) At a cost that is no more than the regular cost charged to other persons

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications cannot be made accessible, the organization shall provide the requestor with:

- a) An explanation as to why the information or communications cannot be made accessible; and
- b) A summary of the inaccessible information or communications

We notify the public about the availability of accessible formats and communication supports in accordance with 7.0 of this policy. The Township is also committed to meeting the internationally recognized Web



Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility legislation.

## 11.0 Employment

The Township notifies employees, job applicants and the public that they can request an accommodation through any stage of the recruitment process. This statement is included in all job postings and on the Careers section of the Township's website. The Township consults with applicants to arrange for appropriate accommodation.

The Township will notify successful applicants of policies for accommodating employees, including the Individual Accommodation Policy, when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information 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.

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

- Information that is needed to perform the employee's job; and
- Information that is generally available to employees in the workplace

Our performance management, career development and redeployment processes consider the accessibility needs of all employees, as provided for in the Township's Return to Work and Performance Management Policies.

## 12.0 Emergency Response Information

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is helping that employee during an emergency.



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

We 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 or plans are reviewed; and
- When the employer reviews its general emergency response policies.

### 13.0 Design of Public Spaces

The Township will meet accessibility laws when constructing or making major changes to public spaces. The Township is committed to improving the accessibility of all public spaces. Public spaces include:

- Recreational trails/beach access pathways
- Outdoor eating areas/picnic areas and rest stops
- Outdoor play spaces (i.e. playgrounds)
- Accessible off-street parking
- Accessible on-street parking
- Service-related elements like service counters and waiting areas

Procedures are in place to prevent service disruptions to the accessible areas in our public spaces.

### 14.0 Transportation

Accessible transportation legislation does not apply to the Township of Georgian Bluffs as it does not operate conventional and/or specialize transit services. However, the Township is committed to making information about accessible transit resources in surrounding municipalities accessible to the public.

### 15.0 Changes to Existing Policies

Any policies of this organization that do not comply with, respect, or promote the principles of dignity, independence, integration, and equal



opportunity for people with disabilities will be modified, replaced, or repealed.

## **Monitoring and Review**

This policy shall be reviewed bi-annually with any pressing amendments made by the Clerk's Department as required.



## Accessible Feedback Form

Please submit completed forms to: [clerks@georgianbluffs.ca](mailto:clerks@georgianbluffs.ca)

### Your Information

Name:

Date:

Email:

Phone Number:

Address:

### Your Comments or Questions

Please let us know how we can improve:

### Response from the Township of Georgian Bluffs (For Office Use Only)

Staff Name:

Date:

Response Details:

The Township of Georgian Bluffs is committed to providing accessible and inclusive services to people of all abilities.