



Policy: Accessibility

Policy Number: 100-40-2017

Former Policy Number: 100-40-2013

Date: January 23rd, 2017

ACCESSIBILITY

Purpose:

The purpose of this policy is to provide for the overarching framework to guide the review and development of other Township of Lucan Biddulph goods, services, programs and facilities in an inclusive manner that takes into account the needs of people with disabilities.

In addition, this policy will act as the main accessibility policy for the Township of Lucan Biddulph and meet the requirements of Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation.

Scope:

All Municipal Employees and Members of Council.

Policy:

The Township of Lucan Biddulph is committed to being responsive to the needs of all its residents and employees. In order to meet the needs of people with disabilities the Township will:

- Ensure policies, practices and procedures address dignity, independence, integration and provide for equal opportunity for people with disabilities.
- Allow people with disabilities to use their own personal assistive devices to obtain, use or benefit from the services offered by the Township.
- Accommodate the accessibility needs of people with disabilities to ensure they can obtain, use or benefit from the Township's goods, services, programs and facilities.
- Communicate with people with disabilities in a manner that takes into account the person's disability.

The Township will promote accessibility by ensuring that compliance is met for all regulations made under the *Accessibility for Ontarians with Disabilities Act*, 2005, S.O. 2005 c. 11.

Definitions

- Disability: as defined by the *Ontario Human Rights Code*, R.S.O. 1990, c. H. 19
- Service Animal

For the purposes of this policy, an animal is a service animal for a person with a disability if:

1. 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
 2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - (a) A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - (b) A member of the College of Chiropractors of Ontario.
 - (c) A member of the College of Nurses of Ontario.
 - (d) A member of the College of Occupational Therapists of Ontario.
 - (e) A member of the College of Optometrists of Ontario.
 - (f) A member of the College of Physicians and Surgeons of Ontario.
 - (g) A member of the College of Physiotherapists of Ontario.
 - (h) A member of the College of Psychologists of Ontario.
 - (i) A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario
- Guide Dog: a guide dog as defined in the *Blind Persons' Right Act*, R.S.O. 1990, c. B.7

For all other definitions, refer to the *Integrated Accessibility Standard Regulation* (O. Reg 191/11). This regulation will be referred to as the "IASR" for the remainder of this policy.

Accessibility Planning

The Township will establish, implement, maintain and document a multi-year accessibility plan. The multi-year accessibility plan will outline how the Township will prevent and remove barriers to accessibility as outlined in the IASR. The multi-year accessibility plan will be developed with participating lower tier municipalities.

The plan will be posted on the Township's website, and will be available in an accessible format upon request. The plan will be updated at least once every five years.

The Township will establish, review and update its accessibility plans in consultation with people with disabilities and the Accessibility Advisory Committee.

An annual status report will be prepared outlining the progress taken to implement the strategy of the plan. The status report will be posted on the Township's website.

Procurement

The Township will incorporate accessibility design, criteria and features when purchasing or acquiring goods, services or facilities, except where it is not practicable to do so.

Should the Township determine that it is not practicable to incorporate accessibility design, criteria and features when purchasing or acquiring goods, services or facilities, it will provide an explanation upon request.

Emergency Procedures, Plans and Public Safety Information

The Township will provide emergency procedures, plans and public safety information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Accessible Formats and Communication Supports/Format of Documents

The Township will provide alternate formats of information and communications that are produced by, or in direct control of the Township. This does not apply to information that the Township does not control directly or indirectly through a contractual relationship.

This will be done upon request, in a timely manner and at a cost that is no more than the cost charged for the original format.

When it is not practicable to provide an alternate format, the Township will provide an explanation and a summary of the document in an accessible format.

The Township will provide communication supports to members of the public upon request.

If the Township is unable to obtain the requested communication support, the Township will consult with the individual to determine an appropriate alternative method of communication.

The Township will consult with the individual making the request to determine the suitability of an accessible format or communication support.

Feedback

The Township will accept feedback from members of the public relating to the provision of accessible goods, services or facilities to people with disabilities. The Township will ensure that the feedback process is accessible to people with disabilities by providing, or arranging for the provision of accessible formats and communication supports, upon request.

The Township will develop procedures that specify the actions that will be taken if a complaint is received about the manner in which it provides goods, services or facilities to people with disabilities.

Information regarding the feedback process will be posted on the Township's website. Individuals can request this information by contacting the Township.

In accordance with section 11 of the "*IASR*" when seeking feedback from the public, the Township will provide accessible formats and/or communication supports to members of the public upon request.

Temporary Service Disruptions

If a temporary service disruption is planned, the Township will give notice of the disruption.

Notice of the disruption will include: the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any that are available.

Procedures for specific service disruptions will be developed, and a copy of the procedures will be available to individuals upon request.

Notice will be given by posting the information in a conspicuous place as well as by posting the information on the Township's website.

Support Persons

The Township will allow people with disabilities to be accompanied by a support person in all Municipally-owned and operated public facilities. The Township reserves the right to request a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and consider the available evidence, the Township determines that:

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

Admission fees will be waived for support persons who accompany a person with a disability.

Service Animals

The Township will ensure that an individual accompanied by a service animal is permitted to enter the premises with the animal and to keep the animal with the individual, unless the animal is otherwise excluded by law from the premises.

If a service animal is excluded by law from the premises, the Township will ensure that other measures are available to ensure a person with a disability is able to obtain, use or benefit from the Township's goods, services or facilities.

The individual with the service animal is responsible for the care and control of their service animal at all times, while on Municipal premises.

Use of Assistive Devices

The Township will allow people with disabilities to use their own personal assistive devices to obtain services offered by the Township.

If a person with a disability is unable to access a service through the use of their own personal assistive device, the Township will work with the individual to determine an alternate means for accessing services.

Training

The Township will provide training to:

- All people who are an employee of, or a volunteer with the organization
- All people who participate in developing the organizations policies; and
- All other people who provide goods, services or facilities on behalf of the organization

The training will include:

- An overview of the *Ontario Human Rights Code*
- A review of the *Accessibility for Ontarians with Disabilities Act, 2005*
- A review of the *Integrated Accessibility Standards Regulation* (O.Reg 191/11)
- Specific review of "IASR" requirements, based on the duties associated with the employee.
- How to interact and communicate with people with various types of disabilities
- How to interact with people 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 Township's premises or otherwise provided by the Township 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 disability is having difficulty accessing the Township's goods, services or facilities.

The training will be appropriate to the duties of the employees, volunteers and other people. Employees will be trained as soon as practicable. Training will be provided to the aforementioned individuals with respect to any policy changes on an ongoing basis. Training logs will be kept in accordance with the "IASR".

Design of Public Spaces

The Township will comply with the requirements found in Part IV.1 of the "IASR" where applicable, in relation to public spaces.

Website and Web Content

In accordance with the "IASR", the Township will ensure that websites and web content are created in a manner keeping with the expectations of the Web Content Accessibility Guidelines 2.0 (WCAG). The Township's currently working on ensuring that websites and web content in accordance with WCAG 2.0, level A and will ensure that websites and web content are created in accordance with level AA by January 1, 2021. If an individual is having difficulty accessing any Municipally-owned or operated website, or content found on said websites, they can contact the Township.

- Websites

The County of Middlesex Information Technology Services Department (ITS) will be responsible for ensuring that new websites are created in accordance with WCAG 2.0.

The Information Technology Services Department (ITS), along with the Township's Accessibility Coordinator, will be responsible to ensure that existing websites are maintained in accordance with WCAG 2.0. Existing websites will be scanned quarterly to determine compliance. Existing websites will be updated in accordance with WCAG 2.0 based on a reasonable schedule as defined by the Director of Information Technology Services, and the Township's Accessibility Coordinator.

- Web Content

Accessible web content is being produced in the following ways:

In-house: Staff receive training that ensures PDF documents are created in accordance with WCAG 2.0.

Purchased Documents or Videos: The Department purchasing a document or video that will be available on the Township's website shall ensure that the document or video is created in a manner that ensures compliance with WCAG 2.0.

Third-Party Documents: The Township will put forward efforts to ensure that documents provided to the Township on behalf of a third party, that will be posted on the Township's website, and not in direct control of the Township through a contractual relationship, will be remediated in accordance with WCAG 2.0, unless it is not practicable to do so.

In the event that it is not practicable to remediate a third party document, for which the Township is not in direct control through a contractual relationship, a member of the public may contact the Township to arrange for the information to be provided in an accessible format, upon request. The Township will consult with the requesting individual to determine suitability of format.

Legislative Authority

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11

Integrated Accessibility Standard Regulation (O. Reg 191/11)

Ontario Human Rights Code, R.S.O. 1990, c. H. 19