



Accessibility Policy

September 2016



Accessibility Policy

in accordance with the
Integrated Accessibility Standards Regulation
O.Reg. 191/11, as amended

Purpose

Under the *Accessibility for Ontarians with Disabilities Act, 2005* all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy has been drafted in accordance with *The Integrated Accessibility Standards Regulation, Ontario Regulation 191/11, as amended* and addresses how the County of Lennox and Addington will achieve accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that the County of Lennox and Addington will follow to provide accessibility supports to Ontarians with disabilities.

Responsibilities

The responsibilities set out in this policy and the Integrated Accessibility Regulation are not a replacement or a substitution for the requirements established under the *Human Rights Code* nor do the standards or policy limit any obligations owed to persons with disabilities under any other legislation.

The requirements of the Regulation include:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the County of Lennox and Addington's strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities. (Please refer to By-Law 3054/07);
- Training; and
- Other specific requirements with regard to Information and Communication, Employment, Transportation, Design of Public Spaces and Customer Service.

Policy Statement and Organizational Commitment

The County of Lennox and Addington is committed and guided by the four core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in the *Canadian Charter of Rights and Freedoms, and the Accessibility for Ontarians with Disabilities Act, 2005*.

The County of Lennox and Addington will make every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

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**” means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person’s unique needs.

“**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.

“**Communications**” means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

“**Conversion Ready**” means an electronic or digital format that facilitates conversion into an accessible format.

“**Designated Public Sector Organization**” means every municipality and every person or organization listed in Column 1 of Table 1 of Ontario Regulation 146/10 (Public Bodies and Commission Public Bodies — Definitions) made under the *Public Service of Ontario Act, 2006*.

“**IAP**” means Individualized Accommodation Plan.

“**Information**” includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

“**Internet Website**” means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

“**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.

“**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, wheelchair, scooter or similar aid.

“**New Internet Website**” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

“**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.

“Unconvertible” means

- (a) It is not technically feasible to convert the information or communications;
- (b) The technology to convert the information or communications is not readily available.

“Web Content Accessibility Guidelines” means the world wide web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.

General Provisions

Multi-Year Accessibility Plan

The County of Lennox and Addington’s Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. The County of Lennox and Addington will report annually on the progress and implementation of the plan, post the information on the County website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years.

Procuring or Acquiring Goods, Services or Facilities

The County of Lennox and Addington will have regard for accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so (in which case, if requested, an explanation will be provided.)

Self-Service Kiosk

The County of Lennox and Addington shall have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

Training

The County of Lennox and Addington will ensure that training is provided to all employees on the requirements of the accessibility standards (information and communication, employment, transportation, design of public spaces and customer service) referred to in the Regulation and on the *Human Rights Code* as it pertains to persons with disabilities. Ongoing training will be provided to new employees as soon as practicable. If any changes are made to this policy or the requirements training will be provided. The County of Lennox and Addington shall maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

Information and Communication Standard

The County of Lennox and Addington will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If the County of Lennox and Addington determines that it is not technically feasible to convert the information or communications, or the technology to convert the information or communication is not readily available, that person who requires the information will be provided with:

- an explanation as to why the information or communications are not convertible; and
- a summary of the unconvertible information or communications.

Emergency Information

The County of Lennox and Addington will provide its emergency procedures, plans or public safety information which are made available to the public, in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

The County of Lennox and Addington has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. The County of Lennox and Addington notifies the public about the availability of accessible formats and communication supports with respect to the feedback process on feedback forms and the County website.

Accessible Formats and Communication Supports

The County of Lennox and Addington shall provide or arrange for accessible formats and communication supports for persons with disabilities:

- Upon request, in a timely manner that takes into account the persons' accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons;
- In consultation with the person making the request to determine the suitability of an accessible format or communication support.

The public shall be notified about the availability of accessible formats and communication supports on correspondence, notices and the County website.

Website Accessibility

The County of Lennox and Addington will redevelop its internet website in 2017. The new website will conform with WCAG 2.0 Level AA.

Public Library Materials and Resources

The County of Lennox and Addington's Public Libraries shall:

- Provide or arrange access to accessible formats of library materials where they exist;
 - Consider the accessibility needs of their users when acquiring new materials.
 - Make information about the availability of accessible materials known to the public.
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Employment Standard

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

Specific requirements include:

Recruitment

The County of Lennox and Addington shall:

- Notify employees and the public about the availability of accommodations for applicants with disabilities during the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- Consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability, if a selected applicant requests an accommodation;
- Notify successful applicants of the policies for accommodating employees with disabilities.

Employee Notification

The County of Lennox and Addington shall inform its employees of its policies used to support 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 a disability:

- As required, to new employees, as soon as practicable after they begin their employment;
- 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 a disability.

Accessible Formats

When an employee with a disability requests it, the County of Lennox and Addington will consult with the employee to provide or arrange for the provision of accessible formats and communication supports:

- For information that is needed in order to perform the employee's job;
- For information that is generally available to employees in the workplace; and
- In consultation with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

The County of Lennox and Addington shall have in place a written process for the development of a documented individual accommodation plan for employees with a disability.

The process will include:

- The employee's participation in the development of the IAP;
- Assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- The County of Lennox and Addington may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- Employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace not from a bargaining agent;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- Identification of any other accommodation that is to be provided.

Return to Work

The County of Lennox and Addington will have a return to work process in place for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. Such processes will be documented and will outline the steps that the County of Lennox and Addington will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement, and Redeployment

The County of Lennox and Addington will take into account the accommodation needs and/or individual accommodation plans of employees when:

- Using performance management processes;
- Providing career development and advancement information;
- Using redeployment procedures.

Workplace Emergency Response Information

The County of Lennox and Addington shall provide individualized workplace emergency response information to employees who have a disability:

- If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability;
- With the employee's consent, to the person designated by the County of Lennox and Addington to provide assistance to the employee if required;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- And will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

Transportation Standard

The Transportation Standard makes it easier for people to travel on specialized and public transit and in taxicabs in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers.

The County of Lennox and Addington is not a provider of specialized or public transit and does not license taxicabs, therefore the transportation standard requirements do not apply to the municipality.

Design of Public Spaces Standard

The County of Lennox and Addington is committed to meeting accessibility laws when building or making major changes to public spaces. The County will maintain all accessible elements as per County maintenance procedures.

Customer Service Standard

The County of Lennox and Addington will provide goods and services to people with disabilities, with particular consideration of the following areas:

Communication

The County of Lennox and Addington will communicate with people with disabilities in ways that take into account their disability. Staff who communicate with customers will be trained on how to interact and communicate with people with various types of disabilities.

The County of Lennox and Addington is committed to providing fully accessible telephone service to our customers. Staff will be trained to communicate with customers over the telephone in clear and plain language, to speak clearly and slowly and to tailor their responses as much as possible in support of the individual.

The County of Lennox and Addington will offer to communicate with customers by other means, including relay service or e-mail, if telephone communication is not suitable to their communication needs or is not available.

Assistive Devices

The County of Lennox and Addington is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. Staff will be trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.

The County of Lennox and Addington will also ensure that staff know how to use the assistive devices which are available on our premises, including electronic door openers and elevators.

Billing

The County of Lennox and Addington is committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in large print or by e-mail, upon request.

Any questions customers may have about the content of the invoice will be answered in person, by telephone or e-mail.

Use of Service Animals and Support Persons

The County of Lennox and Addington is committed to welcoming people with disabilities who are accompanied by a service animal, in the areas of our premises that are open to the public and other third parties. All staff, volunteers and others dealing with the public will be properly trained in how to interact with people with disabilities who are accompanied by a service animal.

The County of Lennox and Addington is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the County of Lennox and Addington's buildings with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on County premises.

No admission will be charged to the support person for admission to the County of Lennox and Addington Museum. Customers will be informed of this by a notice that will be posted in the County of Lennox and Addington Museum and on the County of Lennox and Addington's website.

Notice of Temporary Disruption

The County of Lennox and Addington will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises.

Feedback Process

The ultimate goal of the County of Lennox and Addington is to meet and surpass customer expectations while serving all people, including those with disabilities. Comments regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way the County of Lennox and Addington provides goods and services to people with disabilities can be made by using a feedback form, by mail, e-mail, or verbally. The public is notified about the availability of accessible formats and communication supports with respect to the feedback process on the feedback form and the County website. All feedback should be directed to the Clerk. Customers can expect a response within thirty (30) days.

Modifications to This Policy

The County of Lennox and Addington is committed to developing accessibility policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Additional training will be provided to all employees, volunteers and policy developers if any changes are made to the County's Accessibility Policy.

Questions About This Policy

If anyone has a question about the policy, or if the purpose of a policy is not understood, inquiries should be referred to the Clerk of the County of Lennox and Addington.

Alternate Format

Alternate formats of this document are available free of charge, upon request.