

# Accessibility Policy

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<b>Branch:</b>	People and Belonging	<b>Date Revised:</b>	
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<b>Approved By:</b>	SMT	<b>Prepared By:</b>	People and Belonging;

## 1.0 Policy Statement

This policy establishes the Integrated Accessibility Standards in the areas of Employment, Information and Communication, Transportation and Design of Public Spaces for the Town of East Gwillimbury. The requirements set out in this policy and the Integrated Accessibility Standards 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.

## 2.0 Purpose

This policy complies with the Integrated Accessibility Standards Regulation and addresses how the Town of East Gwillimbury will achieve accessibility through meeting the Regulation's requirements. It provides direction to employees that will enable them to provide accessibility supports to Ontarians with disabilities.

## 3.0 Definitions

Term	Definition
<i>Accessible Formats</i>	May include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.
<i>Accommodation</i>	The arrangement(s) the Town makes or assistance it provides so that persons with disabilities can participate in the experiences available to others. Accommodation will vary depending on the person's unique needs.

Term	Definition
<i>Communication Supports</i>	Ways for people who cannot access verbal or audio information to receive it visually or ways for people who are non-verbal to communicate with people who speak. 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.
<i>Communications</i>	Means the interaction between two or more persons or entities, or any combination of them, where information is provided, published, sent or received.
<i>IAP</i>	Individualized Accommodation Plan.
<i>Information</i>	Includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
<i>Website</i>	A collection of related web pages published on Town servers or external hosted servers for the Town, that provide related information or communication content of records, images, videos, or any other digital assets, made either private or public.
<i>Kiosk</i>	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.
<i>Redeployment</i>	The reassignment of employees to other departments or jobs within the organization.
<i>Unconvertible</i>	Means <ol style="list-style-type: none"> <li>a) It is not technically feasible to covert the information or communications.</li> <li>b) The technology to convert the information or communications is not readily available.</li> </ol>
<i>Web Content Accessibility Guidelines</i>	Means the World Wide Web Consortium (W3C) recommendation, entitled “Web Content Accessibility Guidelines” (WCAG).

## 4.0 Responsibilities

### 4.1 Management will:

- Educate employees and ensure compliance with all aspects of the policy.
- Demonstrate behaviours that are consistent with the policy.
- Provide support and guidance to staff members in fulfilling the policy.
- Ensure all staff are trained according to the requirements of the AODA legislation.
- When aware of areas of non-compliance, ensure appropriate action is taken.
- Regularly review AODA obligations and, where necessary, update all accessibility related policies, practices, and procedures.

### 4.2 Employees will:

- Comply with all aspects of the policy.
- Demonstrate behaviours that are consistent with the policy.
- Participate fully in training as it relates to this policy.
- When aware of areas of non-compliance ensure their supervisor or manager is notified.

## 5.0 Policy Provisions

### 5.1 General Requirements

#### 5.1.1 Multi-Year Accessibility Plan:

The Town of East Gwillimbury shall establish and maintain a Multi-Year Accessibility Plan outlining a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA. The Town of East Gwillimbury will report annually on the progress and implementation of the plan, post the information on the Town's website, and will provide it in alternative formats upon request. The plan will be reviewed and updated, in consultation with persons with disabilities and the Accessibility Advisory Committee, at least once every five years.

#### 5.1.2 Procuring or Acquiring Goods, Services or Facilities:

When procuring or acquiring goods, services, or facilities, the Town shall incorporate accessibility criteria and features, and will do so as early as possible in the procurement process, except where it is not practical to do so. In which case, if requested, an explanation will be provided.

Ensuring accessibility is incorporated into all procurement activities is the primary responsibility of the department who prepares these activities and contracts. Any third parties that provide goods, services, or facilities on the Town's behalf must ensure their staff has received appropriate training as required by the AODA and its Regulations.

#### 5.1.3 Self-Service Kiosks:

The Town of East Gwillimbury shall take steps to make self-service kiosks accessible to persons with disabilities so they can be used independently and securely. The Town will consider accessibility features when designing, procuring, or acquiring self-service kiosks.

#### 5.1.4 Training:

The Town of East Gwillimbury will ensure that training on the requirements of the accessibility standards referred to in the Regulation and in the Human Rights Code, as it pertains to persons with disabilities is provided to:

- a) All employees and volunteers;
- b) All persons who participate in developing the Town's policies; and
- c) All other persons who provide goods, services or facilities on behalf of the Town.

Ongoing training will be provided to new employees as soon as practicable. If any changes are made to this policy or the Regulations, updated training will be provided.

The Town of East Gwillimbury shall maintain a record of training which includes the dates training was provided and the number of individuals to whom it was provided.

## 5.2 Information and Communication Standards Requirements

The Town of East Gwillimbury will create, provide, and receive information and communications in ways that are accessible to people with disabilities.

If the Town of East Gwillimbury determines that it is not technically feasible to convert the information/communication or the technology to convert it is not readily available, the Town will be obligated to provide the person who requires the information with:

- a) An explanation as to why the information or communications are unconvertible; and
- b) A summary of the unconvertible information or communications.

#### 5.2.1 Emergency Information:

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

#### 5.2.2 Feedback:

The Town shall establish a process for receiving and responding to feedback specifically regarding the manner in which the Town provides accessible goods or services to people with disabilities, as outlined in the Accessible Customer Service Policy.

#### 5.2.3 Accessible Formats and Communication Supports:

The Town of East Gwillimbury shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities:

- a) in a timely manner that considers the persons' accessibility needs; and
- b) at a cost that is no more than the regular cost charged to other persons.

The Town will consult with the person making the request and determine suitability of an accessible format or communication support.

The Town will notify the public about the availability of accessible formats and communication supports.

#### 5.2.4 Website Accessibility:

The Town of East Gwillimbury shall make its website and web content conform with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1 Level AA other than criteria 1.2.4 (live captions) and 1.2.5 (pre-recorded audio descriptions).

### 5.3 Employment Standard Requirements

The Town of East Gwillimbury welcomes diverse applicants, including persons with disabilities.

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 to employees and does not apply to volunteers and other non-paid individuals.

### 5.3.1 Recruitment:

The Town of East Gwillimbury shall notify employees and the public about the availability of accommodations for applicants with disabilities, including in job postings:

- During the recruitment process when job applicants are individually selected to participate in an assessment or selection process.
- If a selected applicant requests an accommodation, the Town shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that considers the applicant's disability.
- Notify successful applicants of the policies for accommodating employees with disabilities.

### 5.3.2 Employee Notification:

The Town of East Gwillimbury shall inform employees of policies used to support employees with a disability, including but not limited to, policies on the provision of job accommodations that consider 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 consider an employee's accessibility needs due to a disability.

### 5.3.3 Accessible Formats and Communications Supports:

In addition to, and where an employee with a disability requests it, the Town of East Gwillimbury will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed to perform the employee's job;
- Information that is generally available to employees in the workplace; and
- Consultation with the employee making the request to determine the suitability of an accessible format or communication support.

#### 5.3.4 Individual Accommodation Plan (IAP):

The Town of East Gwillimbury has in place a written process for the development of a documented individual accommodation plan for employees with a disability. This process includes:

- 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 Town of East Gwillimbury may request an evaluation by outside medical or other expert, at the Town's expense, to assist with determining accommodation and how to achieve accommodation.
- The 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 an accommodation request is denied, the reasons for denial are to be provided to the employee.
- Provided in 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.

#### 5.3.5 Return to Work:

The Town has a documented return-to-work process in place for employees who were absent from work due to an injury or disability and require disability-related accommodations to return to work. Please refer to the Accommodation and Return to Work Policy for additional information.

### 5.3.6 Performance Management, Career Development and Advancement, and Redeployment:

The Town of East Gwillimbury will consider the accommodation needs and/or individual accommodation plans of employees when:

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

### 5.3.7 Workplace Emergency Response Information:

The Town provides individualized workplace emergency response information to employees who have a disability:

- As soon as practicable after becoming aware of the need for accommodation due to the employee's 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.
- If the employee who receives individual workplace emergency response information requires assistance, and with the employee's consent, the Town of East Gwillimbury shall provide the workplace emergency information to the person designated by the Town to provide assistance to the employee.

The Town shall 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.

## 5.4 Transportation Standard Requirements

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers.

The Town of East Gwillimbury will:

- Consult with Accessibility Advisory Committee, persons with disabilities and the public to determine the proportion of accessible taxicabs required in the community, including steps to meet the need.
- Ensure taxicabs do not charge a higher fare or additional fee to persons with disabilities.



- Ensure taxicabs do not charge a fee for storage of assistive devices.
- Ensure taxicabs have appropriate information displayed on the rear bumper and available in an accessible format to passengers.

## 5.5 Design of Public Spaces for the Built Environment Requirements

The Town of East Gwillimbury shall meet the requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and in particular, the Design of Public Spaces Standards (Accessibility Standards for the Built Environment) in relation to:

- Recreational trails/beach access routes.
- Outdoor public-use eating areas like rest stops or picnic areas.
- Outdoor play spaces, like playgrounds in municipal parks.
- Exterior 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 such as service counters, fixed queuing lines and waiting areas.
- Scheduled preventative maintenance.

## 6.0 Related Documents

- Accessible Customer Service Policy
- Accommodation and Return to Work Policy