

# **Integrated Accessibility Standards Regulation (IASR) Policy Corporation of the Township of Edwardsburgh/Cardinal, 2013**

## **1. 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 establishes the Integrated Accessibility Standards Regulation in the areas of Information & Communication, Transportation and Employment Standards for the Corporation of the Township of Edwardsburgh/Cardinal in accordance with Ontario Regulation 191/11 and with the Ministry of Community and Social Services' intent to "streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations". This regulation came into force July 1, 2011.

## **2. Scope and Responsibilities**

This policy has been drafted in accordance with the Regulation and addresses how the Corporation of the Township of Edwardsburgh/Cardinal achieves accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that the Corporation of the Township of Edwardsburgh/Cardinal will follow to provide accessibility support to Ontarians with disabilities.

The requirements of the Regulation include:

- ↻ Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the Corporation of the Township of Edwardsburgh/Cardinal'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;
- ↻ Training; and
- ↻ other specific requirements under the Information and Communication, Employment and Transportation Standards

## **3. Policy Statement and Organizational Commitment**

The Corporation of the Township of Edwardsburgh/Cardinal is committed and guided by the four core principles of dignity, integration, full inclusion and equal opportunity and supports the needs of persons as set out in the *Accessibility for Ontarians with Disabilities Act, 2005*. The Corporation of the Township of Edwardsburgh/Cardinal shall use every effort to ensure that the needs of people with disabilities are met, in a timely manner, through the implementation of this policy.

## **4. Definitions:**

**accessible formats:** formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats may include large print, Braille, audio and electronic formats such as DVDs, CDs, screen readers, etc.

**accessibility plan:** a plan that describes the actions an organization will take to prevent and remove barriers and when it will do so.

**communication supports:** supports that individuals with disabilities may need to access information. Some examples include plain language, sign language, as well as reading the information out loud to a person with vision loss, adding captioning to videos or using written notes to communicate with someone who is hard of hearing.

**conversion-ready formats:** refers to any electronic or digital format that facilitates conversion into accessible formats, such as Braille, large print, audio cassettes, CDs, DVDs, etc.

**designated public sector organization:** refers to organizations listed in Schedule 1 of the Integrated Accessibility Standards Regulation (Broader Public Sector). These organizations include hospitals, universities, colleges of applied arts and technology, district school boards and organizations that provide public transportation such as municipalities.

**documented individual accommodation plan:** a plan developed by an employer, in consultation with an employee with a disability that documents the accommodations that will be provided so the employee can do his/her job. These plans are living documents which are regularly reviewed.

**individual workplace emergency response information:** refers to the information provided by employers, in consultation with their employees who have disabilities, to help them prepare for emergencies such as fire, severe weather and power outages.

**internet website:** an organization's external website that is available to the public and contains a collection of related web pages, images, videos and other digital assets. It is accessible through an Internet address known as a Uniform Resource Identifier (URI).

**support person:** refers to a person who accompanies a person with a disability to help with communication, mobility, personal care or medical needs, or with access to goods, services or facilities.

**unconvertible material:** refers to any information that cannot be converted into accessible formats. For instance, some sectors or organizations might not have easy access to technology that allows them to convert some materials into accessible formats. In other cases, certain information such as that in a textbook might be difficult to convert into accessible formats or conversion ready formats without losing the meaning of the material.

**Web Content Accessibility Guidelines (WCAG):** an international standard for making websites and web content accessible to people with a wide-range of disabilities.

**Web Content Accessibility Guidelines 2.0 Level A and Level AA:** refers to different conformance levels in WCAG 2.0. To meet conformance Level A, all Level A success criteria need to be met; to meet conformance level AA, all level A and AA success criteria need to be met.

## **5. General Provisions**

### **Multi-Year Accessibility Plan**

The Corporation of the Township of Edwardsburgh/Cardinal's Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*.

The Corporation of the Township of Edwardsburgh/Cardinal is committed and will report annually on the progress and implementation of the plan and that information will be posted on the municipalities website and will provide it in alternative formats upon request.

The Corporation of the Township of Edwardsburgh/Cardinal will review and update this plan every five years.

### **Procuring or Acquiring Goods, Services or Facilities**

The Corporation of the Township of Edwardsburgh/Cardinal will use accessibility criteria and features when procuring or acquiring goods, services or facilities except where it is not practicable to do so in which case, if required, the Corporation of the Township of Edwardsburgh/Cardinal will provide an explanation, if requested.

### **Training**

The Corporation of the Township of Edwardsburgh/Cardinal will ensure that training is provided to all employees and regular fee-for-service staff and volunteers on the requirements of accessibility standards and on the *Ontario Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable following the acquisition of new staff and following any amendments or additions to this policy. A record of dates when training was provided and the names of the individuals in attendance will be kept.

## **6. Information and Communications Standard**

The Corporation of the Township of Edwardsburgh/Cardinal will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If the Corporation of the Township of Edwardsburgh/Cardinal 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, the Corporation of the Township of Edwardsburgh/Cardinal will be obligated to provide the person that requires the information with:

- a) an explanation as to why the information/communication is unconvertible and;
- b) a summary of unconvertible information/communication upon request

## **7. Emergency Information**

If the Corporation of the Township of Edwardsburgh/Cardinal prepares emergency procedures, plans or public safety information and makes the

information available to the public, the information will be provided in an accessible format or with appropriate communication supports as soon as possible, upon request.

## **8. Feedback**

The Corporation of the Township of Edwardsburgh/Cardinal has processes in place for receiving and responding to feedback and will ensure that those processes are provided in an accessible manner and with communication support, upon request. The public will be notified about the availability of accessible formats and communication supports.

## **9. Accessible Formats and Communication Supports**

The Corporation of the Township of Edwardsburgh/Cardinal shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities:

- a) Upon request in a timely manner that takes into account the person's accessibility needs;
- b) Costs charged will be no more than the regular fees charged to others
- c) Consult with the person making the request and determine suitability of an accessible format or communication supports;
- d) Notify the public about the availability of accessible formats and communication supports.

## **10. Website Accessibility**

The Corporation of the Township of Edwardsburgh/Cardinal shall make their Internet website and web content conform with the Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2014, any new web content will conform to the WCAG 2.0 Level A. By January 1, 2021, all Internet websites and web content will conform to WCAG 2.0 Level AA.

## **11. Education, Training and Materials**

### **Public Libraries**

The Spencerville Public Library and the Cardinal Public Library shall provide access to or arrange for the provision of access to accessible materials where they exist and shall make information about the availability of accessible materials publically available. They shall provide information in an accessible format or with appropriate communication supports, upon request. Public Library Boards may provide accessible formats for archival materials, special collections and rare books.

## **12. 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 paid employees.

The requirements of the Employment Standard shall be met by the Corporation of the Township of Edwardsburgh/Cardinal by January 1, 2014 unless otherwise specified.

### **13. Recruitment and Retention**

The Corporation of the Township of Edwardsburgh/Cardinal shall notify employees and the public about the availability of accommodation for applicants with disabilities:

- ↻ 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 Corporation of the Township of Edwardsburgh/Cardinal shall consult with the applicant and provide or arrange for accommodations which take into account the person's accessibility needs
- ↻ Notify successful applicants of the Corporation of the Township of Edwardsburgh/Cardinal policies for accommodating employees with disabilities.

### **14. Employee Notification**

The Corporation of the Township of Edwardsburgh/Cardinal 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.

### **15. Accessible Formats**

In addition and where an employee with a disability requests it, the Corporation of the Township of Edwardsburgh/Cardinal 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;
- ↻ Information that is generally available to all employees in the workplace and;
- ↻ In determining the suitability of an accessible format or communication support.

### **16. Individual Accommodation Plan**

The Corporation of the Township of Edwardsburgh/Cardinal shall have in place a written process for the developing a documented individual accommodation plan for employees with a disability. Process to include:

- ↻ The employee's participation in the development of the Individual Accommodation Plan;

- ↪ Assessment on an individual basis;
- ↪ Identification of accommodations to be provided;
- ↪ Timelines for the provision of accommodations;
- ↪ The Corporation of the Township of Edwardsburgh/Cardinal may request an evaluation by medical or other expert at the employer's expense to determine if and how accommodation can be achieved;
- ↪ Employee may request the participation of a representative from their bargaining unit, where the employee is represented or otherwise a representative from the workplace if not represented by a bargaining agent, in the development of the accommodation plan;
- ↪ Steps taken to protect the privacy of the employee's personal information;
- ↪ Frequency with which the Individual Accommodation Plan 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;
- ↪ If requested, any information regarding accessible formats and communications supports provided;
- ↪ Identification of any other accommodation that is to be provided.

## **17. Return to Work**

The Corporation of the Township of Edwardsburgh/Cardinal will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes must be documented and must outline the steps the Corporation of the Township of Edwardsburgh/Cardinal will take to facilitate the return to work and include the Individual Accommodation Plan.

## **18. Career Development and Advancement**

The Corporation of the Township of Edwardsburgh/Cardinal will take into account the accessibility needs and/or individual accommodation plans of employees when:

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

## **19. Workplace Emergency Response Information**

The Corporation of the Township of Edwardsburgh/Cardinal 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 needs for accommodation due to the employee's disability;
- ↪ If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent the Corporation of the Township of Edwardsburgh/Cardinal shall provide the workplace emergency information to the person designated

by the Corporation of the Township of Edwardsburgh/Cardinal to provide assistance to the employee;

- ↪ 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 accommodation needs or plan are reviewed and when the general emergency response policies are reviewed.

## **20. Transportation Standard**

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. Although the Township of Edwardsburgh/Cardinal does not currently offer municipal taxicab licenses, the purpose of this statement is to inform the public of the steps the municipality would take to ensure that accessibility standards were being met in the transportation section.

As a municipality, the Township of Edwardsburgh/Cardinal would:

- ↪ Consult with the public and persons with disabilities in the development of accessible design criteria in the construction, renovation, or replacement of bus stops/shelters, including steps to meet the goal of accessible stops/shelters;
- ↪ Ensure taxicabs do not charge a higher fee 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 at the rear bumper and available in accessible formats to passengers

The Corporation of the Township of Edwardsburgh/Cardinal's Accessibility Plan will include progress made by the municipality to meet the accessible taxi needs of the community and provide accessible bus stops/shelters when this is applicable to the services provided by or arranged for by the municipality.

## **21. Regulatory Requirements**

An Administrative Monetary Penalties scheme is being established under the *Accessibility for Ontarians with Disabilities Act, 2005*. The scheme will allow a director or a designate to issue an order against a person, organization or corporation to pay a penalty amount as a result of non-compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* accessibility standards. The largest penalty amount that can be issues to an individual or an organization that is not a corporation is \$50,000.

Establishes an Administrative Monetary Penalties Program that prescribes the administrative penalties:

- ↪ Use of administrative monetary penalties will be considered an avenue of last resort when all other compliance assistance and improvement options have been exhausted

- ⇒ Designated the License Appeal Tribunal (LAT) to hear appeals of Directors Orders under the *Accessibility for Ontarians with Disabilities Act, 2005*
- ⇒ The LAT will hear appeals from organizations of director's orders, but not individual complaints. Individuals who feel their human rights have not been met would continue to complain to the *Ontario Human Rights Commission*.