

Accessibility Training Procedure

HR Policy - Accessibility

Purpose and Application:

The purpose of this procedure is to address the training requirements of the Integrated Accessibility Standards Regulation. (O. Reg 191/11)

The Municipality of Southwest Middlesex is committed to establishing, implementing and maintaining a program for training on accessibility standards and regulations.

The Municipality of Southwest Middlesex shall ensure that the following receive training about the provision of its goods, services or facilities to people with disabilities:

- Elected officials, members of boards and committees, all employees (full time, part time, temporary, students) and volunteers
- Every person who participates in developing the Municipality of Southwest Middlesex's policies, procedures and practices governing the provision of goods, services or facilities to members of the public.
- All other people who provide goods, services or facilities on behalf of the organization.

Training shall be provided as soon as practicable after assigned the applicable duties as well as on an ongoing basis as changes occur to Municipality of Southwest Middlesex policies, procedures and practices governing the provision of goods, services or facilities to people with disabilities.

Implementation:

The Clerk's Department is responsible for:

- Ensuring training compliance with the Integrated Accessibility Standards Regulation (O. Reg 191/11) and other regulations under the Accessibility for Ontarians with Disabilities Act.
- Coordinating and maintaining training records for compliance reporting and audit purposes.

Departments are responsible for:

- Coordinating and maintaining training records for volunteers.
- Maintaining training records for third parties/contractors.

Accessibility Feedback Procedure

HR Policy - Accessibility

Purpose and Application:

The purpose of this procedure is to establish a process to enable members of the public to comment on the goods, services or facilities offered by the Municipality of Southwest Middlesex.

Implementation:

The Municipality of Southwest Middlesex welcomes public input as feedback helps to identify areas where changes need to be considered and ways in which the Municipality of Southwest Middlesex can improve the delivery of goods, services and facilities.

The Municipality of Southwest Middlesex is committed to establishing, implementing and maintaining a process for receiving and responding to feedback about how to enhance the provision of goods, services and facilities to people with disabilities.

All staff should be advising those who want to provide feedback related to Municipality of Southwest Middlesex goods, services or facilities to fill out a Customer Service Feedback Form.

To Submit Feedback:

If a member of the public wants to provide feedback regarding the goods, services or facilities they have received:

- The member of the public with the concern should have a discussion with the staff member who is involved in the situation where possible.
 - Should discussion not resolve the complaint or the member of the public is uncomfortable discussing the issue with the staff member, the member of the public should fill out a Feedback Form.
- Staff will assist the member of the public with providing feedback, when requested.
- The information to be provided should include the date, a description of feedback, any suggestions by the member of the public on how to resolve if there was an issue and personal contact information if they want to be contacted with a response.
- The form shall be forwarded to the Municipality of Southwest Middlesex Clerk who will forward to the appropriate Manager responsible for the Department and the Accessibility Coordinator.
- The Manager will attempt to resolve the complaint in a timely manner, with the assistance of the Accessibility Coordinator, as required.
- If the member of the public has requested a response, the staff should include:
 - An explanation of how the suggestion will be implemented;
 - Whether further investigation is necessary;
 - The reason if the Municipality of Southwest Middlesex is unable to resolve the matter or implement the suggestion; and

- What other steps may be taken to improve the service.

When Requesting Feedback from the Public:

If the Municipality of Southwest Middlesex is requesting feedback from the public, it shall ensure that materials associated with the feedback process can be made available in an accessible format or with a communication support, upon request.

Refer to the Accessible Formats and Communication Support Procedure for more information.

Support Person Procedure

HR Policy - Accessibility

Purpose:

To ensure a safe and welcoming environment for people with disabilities and their support workers. Staff shall ensure that accessible customer service is provided to all customers in accordance with this procedure and HR Policy 5.01.

To welcome people with disabilities and their support persons in Municipality of Southwest Middlesex-owned or operated facilities.

Definition:

Support person:

A support person, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

Examples:

A support person may provide transportation, communication, interpretation services or help with daily activities. A support person does not necessarily have to be a paid individual.

Implementation:

- People with disabilities are permitted to be accompanied by their support person in areas/premises that are open to the public, when accessing goods, services or facilities owned or operated by the Municipality of Southwest Middlesex.
- Where fees for services are charged, staff shall ensure that the fee is waived for the support person.
- If there is confidential information to be disclosed, consent must be received from the person with the disability.
- The Municipality reserves the right to request a person with a disability be accompanied by a support person when on Municipality owned or operated facilities, but only after consulting with the person and considers the available evidence, the Municipality determines that because of a health and safety risk a person would benefit from attending with a support person. In this situation, employees must:
 - Support the person to the best of their ability while respecting the dignity of the individual; and
 - Contact their supervisor after the support is requested.
 - Supervisors/Managers are to contact the Accessibility Coordinator to discuss how the individual can be supported.

- **In the event that the Municipality requires that a support person be present, the following criteria shall be used when consulting the customer:**
 - **There is a possibility of a significant risk to the health and safety of the customers or others.**
 - **The risk cannot be eliminated or reduced by other means.**
 - **The assessment of the risk is based on consideration of the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm.**
 - **The risk assessment should be based on the individual's actual and apparent characteristics, not on generalizations, misperceptions, ignorance or fears about a disability.**

Request for Accessible Format or Communication Support Procedure HR Policy - Accessibility

Application

This procedure applies to Municipality employees, volunteers and other persons or organizations that provide goods, services or facilities to the public or other third parties on behalf of the Municipality, in accordance with the Integrated Accessibility Regulation developed under the *Accessibility for Ontarians with Disabilities Act (AODA)*, 2005, and in support of the Municipality of Southwest Middlesex's Corporate Accessibility Policy. (HR Policy 5.01)

This procedure applies to all materials and communications products produced or purchased (e.g. consultant reports) by the Municipality for release to the public. It does not apply to products and product labels, unconvertible information, or information that the Municipality does not control directly or indirectly through a contractual relationship.

Each publication should be produced in such a way as to reduce barriers in the original document. Adaptation to another format can be accommodated easily and quickly when accessibility is considered during the development.

Notification

The Municipality will advise the public of the availability of accessible formats and communication supports.

The Municipality will include:

- A link on the Municipality website to the Accessible Formats and Communication Supports Request Form
- The line "Accessible formats and communication supports are available, upon request" is to be placed at the bottom of the front page of:
 - all Council and Committee agendas;
 - all documents for public consultation (such as the Budget Overview or the Official Plan);
 - anywhere else the Municipality determines that notification is reasonable.

Processing Requests

Requests for an accessible format or communication support can be received by staff in person, by phone or by electronic formats such as emails or service requests. Upon receipt of a request, staff will complete the Accessible Formats and Communication Supports Request Form which is forwarded to the Accessibility Coordinator. The request is to be responded to by the

Accessibility Coordinator in consultation with the department from where the request is originating.

All Municipality staff shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided:

- in a timely manner;
- taking into account the person's accessibility needs; and,
- at a cost that is no more than the regular cost charged to other persons.

Once the appropriate format or support is determined with the requestor, staff shall provide or arrange for the provision of the accessible formats and/or communication supports for persons with disabilities.

- If the Accessibility Coordinator determines that information is unconvertible, they shall, in consultation with the department from which the information is originating, provide the person requesting the information or communication with:

- (a) a written explanation as to why the information or communications are unconvertible; and,
- (b) a summary of the unconvertible information or communication.

Timeframe

The timeframe for the conversion process of a document into an accessible format, or the provision of a communication support, can vary depending on the media chosen, the size, complexity, quality of source documents and the number of documents to be converted. The information requested shall be provided in a timely manner depending on the factors previously noted.

If the document being requested is the subject of a public consultation or has a set timeframe for public comment, the timeframe for document conversion and distribution must be taken into consideration.

Cost of Conversion

Creating information and communications in accessible formats on websites can help reduce the cost of conversion.

When a member of the public requests a Municipality document in an accessible format or information with a communication support, the department of origin is responsible for the cost of conversion, materials and distribution of information.

Definitions

Accessible Formats – these may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Common Accessible Formats – some of the most common accessible formats are (but are not limited to):

- HTML or electronic text version online that meet the WCAG 2.0 level A or AA;
- Text saved as an accessible Word document;
- Large text;
- Plain language versions; and,
- Braille.

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

Communication Supports – these may include, but are not limited to: captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Common Communication Supports – some of the most common communication supports are (but are not limited to):

- Screen reader software;
- Verbal plain language explanation of a written document;
- Video captioning, transcripts;
- Alternative and augmentative communication supports such as an FM Loop system or Communication Access Realtime Translation (CART); and,
- Sign language interpretation

Electronic Text – an electronic text means of presentation of information that enables various computer programs to convert the information into a "readable" format; electronic text where all illustrations or graphical information is explained fully in text.

Information – includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning. The AODA information and communication standard does not apply to the following:

1. Products and product labels.
2. Unconvertible information or communications.
3. Information that the Municipality does not control directly or indirectly through a contractual relationship.

Unconvertible – it is not technically possible to convert the information or communications, or the technology to convert the information or communications is not available.

American Sign Language (ASL) Interpreters

If you receive a request for an ASL Interpreter, fill out the Request for Accessible Information and Communications Form. You will need to get some information from the resident making the request, including:

- Name
- Best way to contact the individual. (Keep in mind that the individual requesting an interpreter will likely have a communication disability, and may not be able to use a telephone. Suggest email, fax or Bell Relay Service as a way to communicate.)
- Date of meeting
- Location of meeting
- Make note of what type of meeting it is.

*NOTE: An individual may request a specific interpreter. If they do, you are obligated to try to obtain that specific interpreter for the meeting.

Private interpreters are found through the [Ontario Association of Sign Language Interpreters](#). You can search by individual or by geographical location.

The [Canadian Hearing Society](#) also provides real time captioning (CART) services as an alternative to interpreting.

Contact the Municipality's Accessibility Coordinator for a list of local private ASL interpretation service providers.

Service Animal in the Workplace Procedure HR Policy - Accessibility

Purpose:

To provide a safe and healthy work environment for all employees and members of the public with regards to service animals in the workplace. To welcome people with disabilities and their service animals on the parts of our premises open to the public.

Staff shall ensure that accessible customer service is provided to all customers in accordance with this procedure and HR Policy 5.01.

Definition:

Service animal: An animal is a service animal for a person with a disability if,

- a) 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
- b) 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:
 - i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - ii. A member of the College of Chiropractors of Ontario.
 - iii. A member of the College of Nurses of Ontario.
 - iv. A member of the College of Occupational Therapists of Ontario.
 - v. A member of the College of Optometrists of Ontario.
 - vi. A member of the College of Physicians and Surgeons of Ontario.
 - vii. A member of the College of Physiotherapists of Ontario.
 - viii. A member of the College of Psychologists of Ontario.
 - ix. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. O. Reg. 165/16, s. 16.

Implementation:

Staff Responsibilities

If a service animal accompanies a person with a disability, staff shall ensure that the person is permitted to keep the animal with him or her.

The person with the service animal shall be welcomed in the areas of Municipality owned or operated premises that are open to the public.

Customer's Responsibility

A customer with a disability who is accompanied by a service animal is responsible for maintaining care and control of the animal at all times.

In the unlikely circumstance that the customer is unable to gain control of their service animal staff shall:

Step One:

Advise the customer about their responsibility to maintain appropriate care and control of the animal at all times. Allow the customer an opportunity to gain control and rectify the situation. In the event that the animal is acting in a manner that causes health and safety concerns (i.e. acting in an aggressive manner), staff may proceed directly to step two.

Step Two:

In the event that the animal is acting in a manner that causes health and safety concerns staff may request the customer to remove the animal from the situation and/or area of concern until such time that care and control is resumed. In such a situation staff shall use reasonable efforts to make sure other measures are available to enable the person with a disability to access goods or services.

General Information

- Service animals are specially trained to assist a person with a disability. They might open doors, pick up items, predict seizures, alert to sounds, etc.
- Service animals may be dogs or other types of animals.
- Service animals are not pets — they are working animals. Do not pet or talk to a service animal.
- Service animals provide a vital service; they are allowed to be with their owner at all times, unless otherwise prohibited by law.
- Service animals in training will be welcome in all Municipality owned facilities, provided they adhere to all Municipality procedures relating to service animals.

Identifying a Service Animal

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

When a service animal cannot be easily identified, staff may ask a person to provide documentation (letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

Exceptions

If service animals are prohibited by another law, Municipality staff will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

Exception: Where Food is Prepared, Stored or Sold

The Health Protection and Promotion Act states that animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed or stored. It does make an exception for service animals to allow them to go where food is normally served or sold.

Temporary Service Disruption Procedure HR Policy - Accessibility

Purpose:

The purpose of this procedure is to establish guidelines for providing notification of temporary disruptions of service to people with disabilities. These notices may be for either planned or unexpected disruptions of service.

Implementation:

Notices for both unexpected and planned service disruptions will be provided in a variety of formats that will take into account a range of disabilities and will outline:

- The reason for the disruption;
- Its anticipated duration;
- A description of alternative facilities or services, if any are available; and,
- Contact information.

Notices for unexpected service disruptions will be posted as soon as possible, using large, clear print and plain language at the physical entrances to the facility and throughout the facility (if required) and in any other location that the Municipality deems is necessary.

Notices for planned service disruptions will be posted using large, clear print and plain language at the physical entrances to the facility, and throughout the facility where necessary. In addition, planned service disruptions that are intended to last more than 48 hours will be posted on the Municipality's website.