

**THE TOWNSHIP OF PLUMMER ADDITIONAL
ACCESSIBILITY POLICY AND PROCEDURE MANUAL**

By-Law 2021-51

December 1st, 2021




Mayor: Beth West


Clerk: Vicky Goertzen-Cooke

COMMITMENT

The Township of Plummer Additional is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws. This Multi-Year Accessibility Plan outlines our approach to ensuring that our services are provided in an accessible manner to our employees and the public.

BACKGROUND

Ontario Regulation 429/07 made under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) established accessibility standards for customer service and it applies to every designated public sector organization and to every other person or organization that provides goods or services to members of the public or other third parties and that has at least one employee in Ontario.

OBLIGATIONS

Ontario Regulation 191/11 made under the *Accessibility for Ontarians with Disabilities Act, 2005* requires that municipalities prepare a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet the regulated requirements. The AODA sets out the roadmap for an accessible Ontario by 2025. It contains standards in the following areas:

- Customer service
- Information and Communications
- Employment
- Transportation
- Built Environment

PLUMMER ADDITIONAL'S APPROACH

- Develop and review policies and procedures
- Incorporate accessibility into planning processes
- Providing continued training for staff
- Engage the public in feedback
- Work to remove barriers to employment
- Continue to make facilities accessible
- Ensure there is access to information and communications

PROCUREMENT

The Township of Plummer Additional will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including information being dispersed to the public, unless it is not possible or practical. If it is not possible and practical to do so, an explanation will be provided upon request.

ACCESSIBLE CUSTOMER SERVICE

The Township of Plummer Additional is committed to ensuring that all customers receive services in a timely and accessible manner. Members of the public will receive customer service in a manner that will meet their needs and ensures independence, dignity and equal opportunity. This will be achieved by:

- Reviewing and updating policies to ensure accessible service delivery in consideration of persons with disabilities
- Including accessibility requirements into staff training and orientation materials
- Continuing to provide Accessible Customer Service Training to all staff
- Reviewing customer feedback and taking appropriate action

The Township of Plummer Additional's Accessible Customer Service Policy and Procedures document is available on the Township website at www.plummertownship.ca

INFORMATION AND COMMUNICATIONS

Information and communications policies are an important part of the operations and service provision of the Township of Plummer Additional, and will be created in a way that takes accessibility into consideration. The Township will follow best practices when developing, implementing and maintaining information and communications strategies which will include, but not be limited to the website, printed materials, and face-to-face interactions as able. We will ensure that information and communications are available and accessible to people with disabilities by:

- Compliance with the Web Content Accessibility Guidelines to ensure our website is accessible to people with disabilities
- Providing resource materials in large print
- Ensuring staff have the knowledge, tools and advice necessary to create accessible materials.

EMPLOYMENT

The Township of Plummer Additional is committed to ensuring that the process of finding, getting and keeping a job is as inclusive as possible in order to build an effective workforce. Municipal staff will receive training in order to meet compliance under the Integrated Accessibility Regulation. It is expected that training will cover a variety of topics, including:

Understanding employer obligations to provide employment accommodations

- How to identify and remove barriers in the workplace
- Revising individual work plans and developing a guide, tools and templates to remove barriers from the recruitment process.

TRAINING

The Township of Plummer Additional is committed to training staff and volunteers in Ontario's accessibility laws and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

Employees and volunteers are and will be trained in various aspects of accessibility as it relates to their specific roles. Any person who participates in the development of policies and procedures will be trained, as well as those who provide goods, services or facilities on behalf of The Township of Plummer Additional.

Every person referred to above shall receive training as soon as practicable, and ongoing training will be provided in the event of changes to any of the Township's accessibility policies. Records of training received for all employees and volunteers will be kept on file by the Human Resources Department.

ACCESSIBLE EMERGENCY INFORMATION

The Township of Plummer Additional is committed to providing people with disabilities publicly available emergency information in an accessible way upon request. Employees with disabilities will be provided with individualized emergency response information when necessary.

TRANSPORTATION

The Township of Plummer Additional does not have or provide any public transit or community transportation system.

BUILT ENVIRONMENT

The Township does and will continue to ensure that new facilities and any renovations to existing facilities are designed and built to accessibility standards.

Applications for funding have and will continue to be sought to help the Township address and comply with the accessibility issues. The Township will continue to identify any opportunities to enhance accessibility requirements within the community with the assistance of federal and provincial funding opportunities.

REVIEW AND MONITORING OF THE PROCESS

The Township of Plummer Additional is committed to the continual improvement of access to all municipally owned facilities, premises, and services, and the provision of services to all members of the community with disabilities.

The plan will be reviewed and monitored regularly in order to identify and monitor barriers and the direction in which the Township is moving to remove barriers under the AODA. Council will make decisions regarding

which barriers are to be addressed, and these recommendations will be based on, and subject to, financial constraints and feasibility.

This Municipal Accessibility Plan has been adopted by Council.

COMMUNICATION OF THE PLAN

This plan will be available on the Township website as well as at the Township Office. It will be made available for the review of all persons. Should Braille copies of the plan be requested, Council will make every effort to accommodate by directing staff to contact the Canadian Institute for the Blind, for translation, if required.

CONCLUSION

The Ontarians with Disabilities Act requires municipalities to prepare an accessibility plan. The Township of Plummer Additional has taken advantage of federal and provincial grants to make all facilities, buildings and services more accessible.

As the community grows, the Township will respond to the needs of the community. This plan establishes a benchmark and strategy to become a barrier free and accessible friendly community.

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

1. PURPOSE / BACKGROUND INFORMATION

The Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") is a Provincial Act with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Under the AODA, Ontario Regulation 429/07 entitled "Accessibility Standards for Customer Service" came into force on January 1, 2008, which established standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public, or other third parties.

This policy is drafted in accordance with the Accessibility Standards for Customer Service (Ontario Regulation 420/07) and addresses the following:

- the provision of goods and services to persons with disabilities; • communication with persons with disabilities;
- the use of assistive devices by persons with disabilities;
- the use of service animals by persons with disabilities;
- the use of support persons by persons with disabilities;
- notice of temporary disruption in services and facilities;
- training;
- customer feedback regarding the provision of goods and services to persons with disabilities; and
- Notice of availability and format of documents.

2. APPLICATION

This policy applies to all persons who deal with members of the public or other third parties on behalf of the Township, whether the person does so as an employee, member of Council, agent, volunteer, student or otherwise, and all persons who participate in developing the Township's policies, practices and other procedures governing the provision of goods and services to members of the public or other third parties.

3. POLICY STATEMENT

It is the policy of The Township of Plummer Additional that citizens with disabilities achieve accessibility in the provision of goods and services, consistent with the principles of independence, dignity, integration and equality of opportunity as set out in the regulations of the Accessibility for Ontarians with Disabilities Act, 2005.

4. GENERAL PRINCIPLES

a. The Provision of Goods and Services to Persons with Disabilities

The Township will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- the Township's goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- the provision of the Township's goods and services to persons with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a

- person with a disability to obtain, use or benefit from the Township's goods or services and,
- persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from the Township's goods and services.

b. Communication with Persons with Disabilities

When communicating with a person with a disability, the Township will do so in a manner that takes into account the person's disability.

c. Assistive Devices

The Township of Plummer Additional will ensure that our employees are trained and familiar with various assistive devices that may be used by people with disabilities. If a person with a disability requires assistive devices to access goods or services of the Township, they are allowed to use such devices.

d. Guide Dogs, Service Animals

If a person with a disability is accompanied by a guide dog or other service animal, the Township will permit the person to enter the premises with the animal and keep it with him or her, unless the animal is otherwise excluded by law from the premises. If the service animal or guide dog is excluded by law from the premises, the Township will look to other available measures to enable the person with a disability to obtain, use or benefit from the Township's goods and services.

e. Support Persons

If a person with a disability is accompanied by a support person, they are permitted to enter the premises together and are not prevented from having access to each other while on the premises. The Township may require a person with a disability to be accompanied by a support person while on its premises, but only if 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.

f. Disruption of Services

In the event of a planned or unexpected disruption to services or facilities for individuals with disabilities, the municipality will notify residents promptly. The clearly posted notice will include information about the reason for disruption, its anticipated length of time, and a description of alternative facilities or services, if available. The notice will be posted in a location wherein it will be easily found and will be posted on the Township website.

g. Training

The Township of Plummer Additional will provide training to employees, volunteers and others who deal with the public on their behalf. The training shall be appropriate to the duties of the employees, volunteers and other persons, and such training shall be provided as soon as practicable.

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- The *Human Rights Code*, as it pertains to persons with disabilities.
- The Municipality's plan related to the customer service standard.
- 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 service animal or a support person.
- How to use the assistive devices available on site or which otherwise may help with providing goods or services to people with disabilities.
- What to do if a person with a disability is having difficulty accessing the municipality's services.
- Any changes to the policies, on an ongoing basis.

The Township will log and maintain records which will record the details of the training provided, as well as the name of the person, location, and date the training was completed.

h. Feedback Process

Should a member of the public wish to make a complaint regarding the accessible provision of goods or services they have received, they can advise the Township of their complaint or concern by:

- Sending an e-mail outlining the nature of the complaint or concern to the following email address: info@plummertownship.ca
- Contacting by telephone the Clerk-Treasurer or Deputy Clerk-Treasurer or designate responsible for delivering the goods or services for which there is a complaint or comment
- Attending the municipal office and meeting with the Clerk-Treasurer or Deputy Clerk-Treasurer or designate responsible for delivering the goods or services for which there is a complaint or comment

The Township will provide a written response to anyone providing a written complaint or comment regarding the provision of accessible goods and services, within 30 days.

If deemed appropriate, a complaint or comment regarding the provision of accessible goods and services may be directed to the Clerk-Treasurer for recommendations on how to address the situation. If the Clerk-Treasurer is unable to provide a satisfactory resolution to the complaint, the complainant may present the complaint to Council for final disposition.

Notification to the public about the feedback process shall be provided by posting at the municipal office and on the municipal website.

i. Notice of the Availability of Documents

Should the Township be requested to provide a copy of a document to a person with a disability, the Township shall give the person the document, or the information contained in the document, in a format that takes into account, as much as possible, the person's disability.

Material printed by the municipality should contain a note indicating that alternate formats are available upon request, along with include relevant contact information.

The Township will consult the person requesting the document to determine what alternate format is acceptable, in accordance with the provisions of this policy.

The time frame attached to the conversion process varies depending on the media chosen, the size, complexity, quality of source documents and number of documents to be converted. Documents shall be returned in a timely manner depending on the factors previously noted.

Conversion shall be processed in house wherever possible. When a member of the public requests a Township document, or portion thereof, in an alternate format, the department or agency of origin shall be responsible for the cost of the conversion, materials and distribution, not the public requestor.

Printed documents, where possible, should adhere to the CNIB's Clear Print Standards or any subsequent accessible information and communication policies. Notification to the public about the availability of accessible formats shall be provided by posting on the municipal website.

EMPLOYMENT STANDARDS/ACCOMMODATION

1. PURPOSE/BACKGROUND INFORMATION

This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005.

2. ACCESSIBLE WORK ENVIRONMENT, GENERAL

The Township will:

- Make reasonable effort to create an overall accessible work environment.
- Create a suitable accessible work environment for an employee with a disability, as soon as practicable after the Township becomes aware of their disability. It is the employees' responsibility to make the Township aware of their disability.
- Consult with the employee to take into account their accessibility needs.

3. RECRUITMENT, ASSESSMENT, SELECTION PROCESS

During a recruitment process, the Township shall notify job applicants, when they are individually selected to participate in an assessment or

selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Township shall consult with the applicant and provide or arrange for suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

When making an offer of employment, the Township shall notify the successful applicant of its policies for accommodating employees with disabilities.

4. INFORMING EMPLOYEES OF SUPPORTS

The Township will provide the policies and procedures for accommodating employees with disabilities to new employees as soon as practicable after they begin their employment as part of their employment orientation.

Whenever there is a change to existing policies and procedures for accommodating employees with disabilities, the employee's accessibility needs shall be taken into account.

5. ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Where an employee with a disability so requests it, the Township shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is generally available to employees in the workplace and information that is required to perform the job effectively. The Township shall consult with the employee making the request to determine which accessible format or communication support is suitable.

6. WORKPLACE EMERGENCY RESPONSE INFORMATION

The Township shall provide individualized workplace emergency response information for employees who have a disability if individualized information is necessary and the Township has been made aware of the employee's need for accommodation due to the disability.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the

Township shall provide this information to a designated person that will assist the employee.

The individualized workplace emergency response information shall be reviewed when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the Township reviews its general emergency response policies.

7. INDIVIDUAL ACCOMMODATION PLANS

The Township shall develop written individual accommodation plans for employees with disabilities (Appendix A) that shall include:

- The manner in which the employee can participate in the development of the plan.
- The manner in which the Township can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.
- The steps that will be undertaken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans shall include any information regarding accessible formats and communication supports that are to be provided, the individualized workplace emergency response information, and any other accommodation that is to be provided, upon request.

Individualized accommodation plans are not required for employees who have not made the Township aware of their disability.

8. RETURN TO WORK PROCESS

The Township shall ensure the written return to work process will adequately support employees who have been absent from work due to a disability and who require accommodations to return to work.

The return to work process shall outline the steps the Township will take to facilitate the return to work, including the development of an individual accommodation plan.

The return to work process does not replace or override any other return to work process created by or under any other statute.

9. PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT AND REDEPLOYMENT

The Township will take into account the accessibility needs of employees with disabilities and individual accommodation plans in the performance management process, when providing career development and advancement opportunities and when considering redeployment.