

POLICY HR 4.1.5 Accessibility

Policy Type: Human Resources

Subsection: Accessibility

Policy Title: Accessibility Policy – Corporate policy

Policy Number: HR 4.1.5

Policy Approved By: Council

Effective Date: May 20, 2020

Revised:

Applicable To: All employees, volunteers, and individuals who participate in developing County policies or provide goods, services and facilities on behalf of the County.

If you require this information in an alternate format, please contact the Accessibility Coordinator at 1-800-354-7050 ext. 2327.

Accessibility Policy

Statement of Commitment

The County of Northumberland is committed to ensuring that people of all ages and abilities enjoy the same opportunities as they live, work, visit and invest in our community. The County is 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 (AODA).

This policy is drafted in accordance with the Integrated Accessibility Standards (IASR)(O. Reg. 191/11) under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). The Regulation establishes general requirements and accessibility standards specific to 5 areas and this policy reflects the same. This policy addresses the following:

- [General Requirements](#)
- [Customer Service](#)
- [Information and Communications](#)
- [Employment](#)
- [Transportation](#)
- [Design of Public Spaces](#)

POLICY HR 4.1.5 Accessibility

Definitions

Accessible formats mean alternate approaches to presenting print information, and 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 people without disabilities. Accommodations will vary depending on the persons unique needs.

Alternate formats may include any alternate approach to presenting print information.

Assistive devices may include equipment or technologies a person with a disability uses to help them with daily living (e.g. wheelchairs, prosthesis, hearing aids, visual aids, oxygen tanks, electronic communication devices and specialized computer software and hardware.)

Communications means the interaction between 2 or more persons or entities, or any combinations of them where information is provided, sent or received.

Communication supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, the use of a support person, and other supports that facilitate effective communications.

Disability means

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”)

Guide dog means a guide dog as defined in section 1 of the Blind Persons’ Rights Act.

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

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.

POLICY HR 4.1.5 Accessibility

Service animal means any animal that assists a person with a disability if the following conditions are met:

- 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.

Support person means, in relation to a person with a disability, another person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities. O. Reg. 165/16, s. 16. The support person may be a paid professional, volunteer, family member or friend.

Objective

To establish an overarching framework to guide the review and development of other County of Northumberland policies, standards, procedures, practices, by-laws and guidelines to comply with the integrated accessibility standards developed under the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

Authority

The [Accessibility for Ontarians with Disabilities Act, 2005, S.O.2005, c.11](#) (the Act) requires that obligated organizations establish and implement policies and procedures governing how the organization will achieve accessibility through meeting its requirements under the Act and its [Integrated Accessibility Standards, O. Reg. 191/11](#). (Links are external)

The requirements established in the Act and its regulations are intended to support the purpose and the application of the [Ontario Human Rights Code](#) (the Code). At no time will this policy replace or supersede the rights afforded people with disabilities under the Code, nor

POLICY HR 4.1.5 Accessibility

does the Act and its regulations limit any obligation owed to people with disabilities under any other legislation. (Link is external)

Notwithstanding the regulatory requirements, the County aims to move beyond simple compliance and investigate barrier-reduction opportunities to enhance access and inclusion in its goods, services and facilities.

Scope

Unless otherwise stated, this policy applies to the provision of goods, services and facilities by employees, volunteers and all other persons or organizations that provide goods, services or facilities on behalf of the County of Northumberland.

Procedures – General

Accessibility Advisory Committee

The County of Northumberland has established an Accessibility Advisory Committee, with a majority of the members being persons with disabilities. The Committee advises County Council and all County departments about the requirements and implementation of the AODA accessibility standards and the preparation of accessibility plans, accessibility reports, and other matters for which Council may seek advice

The Committee reviews site plans and drawings for new County facilities, as well as County facilities that are being redeveloped, and provides advice on the identification, removal and prevention of barriers.

Establishment of Accessibility Polices

The County of Northumberland develops, implements and maintains policies governing how the County will achieve accessibility and meet or exceed its requirements under AODA.

The County maintains policies governing how the County will meet its requirements under AODA. The County makes the policies publicly available. Upon request, these polices are available in alternate accessible formats.

Accessibility Plans

The County of Northumberland produces, implements and maintains a multi-year accessibility plan, which outlines the County's strategy to prevent and remove barriers and promote inclusion. The County prepares an annual status report on the progress of the measures taken to implement the multi-year plan. The plan and the annual status updates are posted on the County's website and are available, upon request, in alternate accessible formats and with communication supports.

POLICY HR 4.1.5 Accessibility

Procuring and Acquiring Goods, Services or Facilities

When procuring goods, services or facilities, the County will incorporate accessibility design, criteria and features unless it is not practicable – for example, if there are no accessible features in existence. Where applicable, preference will be given to goods, services and/or facilities that are accessible. If not practicable, or in instances where an item is purchased without accessible features where they exist, the County will provide an explanation, upon request.

Self-serve Kiosks

If the County designs, procures or purchases self-serve electronic kiosks, such as credit / debit payment devices, considerations will be given to the accessibility features to make kiosks available to the widest range of users. Preference will be given to devices that are accessible.

Training

Training will be provided to all employees, volunteers, and anyone who provide goods, services or facilities on behalf of the County and anyone involved in developing County policies and procedures. Training will include:

- A review of the purposes of the AODA and the requirements of the Customer Service Standard.
- The County's accessibility policy
- The Ontario Human Rights Code (as it relates to people with disabilities)
- Areas of the Integrated Accessibility Standards Regulation that are relevant to their work responsibilities
- How to interact and communicate with people with various types of disabilities
- How to interact with people who use assistive devices or require the use of a service animal or support person
- How to use any equipment or assistive devices available to help provide goods, services or facilities to people with disabilities
- What to do if a person with a disability is having difficulty accessing the County's goods, services and facilities.

Training will take place as soon as practicable. The County will maintain a record of the training provided, including the name of the person trained, the method of training and the date the training was provided.

Training will be appropriate to the duties of employees, volunteers and other persons. Training will be provided regularly to new employees. As changes to the County's accessibility policies or other requirements occur, additional training will be provided.

POLICY HR 4.1.5 Accessibility

Customer Service

Provision of Goods and Services

The County of Northumberland will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality at no additional cost;
- Allowing customers with disabilities to do things in their own way, at their own pace when accessing goods and services, as long as this does not present a health and safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Considering individual accommodation needs when providing goods and services; and
- Communicating in a manner that considers the customer's disability.

Assistive Devices

Individuals may use their assistive devices when accessing County goods, services and facilities.

In situations where an assistive device presents a significant and unavoidable health or safety concern, other reasonable measures will be used to ensure the person with a disability can access County goods, services and/or facilities.

Where available, County owned assistive devices will be kept in good working order and the County will inform the public of the availability of such devices.

Support Persons

When accessing goods, services and facilities provided by the County of Northumberland, persons with disabilities may be accompanied by their support person in areas or premises that are open to the public.

In situations where confidential information will be discussed, the County will obtain consent from the person with a disability before any potentially confidential information is mentioned.

The County may require that a person with a disability be accompanied by a support person when on County premises or participating in County-run programs. This would be required only if, after consultation with the person with a disability and considering all information, County staff determine that:

POLICY HR 4.1.5 Accessibility

- a) the support person is necessary to protect the health and safety of the person with a disability and the health and safety of others on the premises; and,
- b) there is no other reasonable way to protect the health and safety of the person with a disability and the health and safety of others on the premises.

Where the County requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, the County will not charge the support person any fees.

Service Animals

When accessing County goods services or facilities, persons with disabilities are welcomed to be accompanied by their guide dog or service animal and keep the animal with them in areas that are open to the public, unless the animal is otherwise excluded by law. If a service animal is excluded by law from the premises, County staff will inform the person of the reason why and ensure that other methods are available for the person to access goods, services and facilities.

A service animal should be easily identified through visual indicators, such as a vest or harness worn by the animal, or when it helps the person perform certain tasks related to the person's disability. When the animal is not easily identified as a service animal, County employees may ask the person to provide documentation from a regulated health professional as described in section 80.45 (4) of Ontario Regulation 191/11.

It is the responsibility of the person using the guide dog or service animal to ensure that the service animal is kept in control at all times.

Communication

County staff will communicate with people with disabilities in ways that take into account their disability. We will work with the person with a disability to determine what method of communication works best for them.

Service Disruption Notices

In the event of a planned or unplanned service disruption, such as an elevator undergoing maintenance, the County will give notice of the disruption to the public. Notice will include the reason for the disruption, its anticipated duration and a description of alternate facilities or services, if any, that are available. Notice may be given by posting the information on the door at public entrances to County facilities or on a prominent place on the premises and/or posted on the County of Northumberland website, through social media or by such other methods as reasonable under the circumstances. (See Attachment 4.1.5 A - Notice of Service Disruption)

POLICY HR 4.1.5 Accessibility

Customer Feedback

The County provides customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process is readily available to all customers with disabilities and notice of the process and feedback forms are made available at each of the County's customer service desks and on the County's website.

Feedback can be submitted:

- By completing the Customer Feedback Form (online form or hard copy – See Attachment 4.1.5 B - Customer Feedback Form)
- By e-mail: accessibility@northumberlandcounty.ca
- By phone: 905-372-3329 ext. 2327
- In person
- By fax: 905-372-3046
- By mail: Accessibility c/o Northumberland County, 555 Courthouse Road, Cobourg, ON, K9A 5J6

A record of feedback will be maintained outlining the details, follow-up and actions to be taken. See Attachment 4.1.5 C - Record of Customer Feedback.

The County will respond to feedback within 10 business days and, if requested, contact the customer to provide an acknowledgement of the feedback along with any resulting actions based on the concerns that were submitted.

Format of Documents

See section below on Accessible Information and Communications: Accessible Formats and Communications support

Accessible Information and Communications

Accessible Formats and Communications Supports

The County of Northumberland strives to provide information in a format accessible to all people. The County will provide or arrange for the provision of accessible formats and communications supports for persons with disabilities, upon request, at no additional cost to the individual. Accessible formats and communications support will be provided in a mutually agreed upon timeframe which considers the circumstances of the person making the request and the urgency of the request. (See Attachment 4.1.5 D - Request Alternate Format or Communication Support)

POLICY HR 4.1.5 Accessibility

The County will consider the person's accessibility needs when customizing individual requests and will consult with the individual making the request and gain agreement in determining the suitability of an accessible format or communications support.

The County will notify the public about the availability of accessible formats and communications support through our website and at customer service desks.

Emergency Procedures, Plans, or Public Safety Information

The County will ensure that all publicly available safety and emergency information is provided in an accessible format or with appropriate communications support, upon request.

Accessible Websites and Web Content

The County of Northumberland will ensure that its internet websites, and where applicable web content, conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels
- Unconvertable information or communications
- Information that the County does not control either directly or indirectly through a contractual relationship.

Unconvertable Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertable, The County will ensure that the individual who made the request is provided with an explanation and a summary of the information.

The County will classify information or communications as unconvertable where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

POLICY HR 4.1.5 Accessibility

Employment

Recruitment, Assessment and Selection

The County of Northumberland will notify employees and the public about the availability of accommodations for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, the County will consult with the applicant and provide or arrange for suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

When making offers of employment, the County will notify successful applicants of its policies and supports for accommodating employees with disabilities.

Employee supports

The County will inform all employees of its policies and procedures used to support employees with disabilities and provide this information to new employees during workplace orientation training.

Notification will be provided to all employees whenever there is a change to existing policies in the provision of job accommodations.

Accessible Formats and Communication Supports for Employees

Upon an employee's request, the County will consult with the employee to provide or arrange for the provision of accessible formats and communications support for:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

The County will consult with the employee making the request to determine the best way to provide the accessible format or communications support.

Workplace Emergency Response Information

Where required, County of Northumberland will create individualized workplace emergency response plans for employees with disabilities. This information will be created in consultation with the employee and take into account the individual's accessibility needs and the nature of the workplace. This will be done as soon as possible after the County becomes aware of the need for accommodation.

In addition, this information shall be provided, with the employee's consent, to the person(s) designated by the County to assist the employee during a workplace emergency.

POLICY HR 4.1.5 Accessibility

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs, or plans, are reviewed; or
- The company reviews general emergency response policies.

Documented Individual Accommodations Plans

The County of Northumberland will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The development process for these plans will include the elements found in section 28(2) of Ontario Regulation 191/11: Integrated Accessibility Standards.

Individual accommodation plans will include information regarding accessible formats and communications supports if they have been requested, the employee's individualized workplace emergency response information, and any other accommodation that is to be provided.

Return to Work

The County of Northumberland will have in place a documented return-to-work process for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work.

This process will outline the steps the County will take to enable a smooth return to work for the employee. All steps and individual accommodation plans will be documented and created in consultation with the employee.

Performance Management and Career Changes

The County of Northumberland will consider the accessibility needs of its employees with disabilities, including any documented individual accommodation plans, during the County's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

Transportation

The Transportation Standard makes it easier for people with disabilities to travel on specialized and conventional public transit and in taxicabs in Ontario.

The County of Northumberland does not provide or operate conventional or specialized transportation services, school transportation or ferries, nor does the County license taxicabs; therefore, the transportation standards do not apply to the County.

POLICY HR 4.1.5 Accessibility

Design of Public Spaces

The County will meet or exceed the AODA Design of Public Spaces Standards, including consultation requirements, when undertaking construction and redevelopment of public spaces in the following areas:

- Recreational trails and beach access routes
- Outdoor public use eating areas
- Outdoor play spaces
- Exterior paths of travel
- Accessible parking
- Obtaining services
- Maintenance of accessible elements

Review

Accessibility policies will be reviewed every 3 years and upon legislative changes.

No changes will be made to any accessibility policy before considering the impact on people with disabilities. Any policy that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

References

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11
Integrated Accessibility Standards Regulation (O. Reg. 191/11)
Human Rights Code, R.S.O. 1990, c. H.19
Blind Persons' Rights Act, R.S.O. 1990, c. B.7.

Supersedes

The following policies will be rescinded and replaced with HR 4.1.5 Accessibility policy:

AODA Compliance
AODA 1.1 Accessible Customer Service
AODA 1.2 Alternative Format Documents
AODA 1.3 Assistive Devices
AODA 3.1 Customer Feedback
AODA 9.1 Integrated Accessibility Standards (2013-01-01)
AODA 14.1 Notice of Availability of Documents
AODA 14.2 Notice of Temporary Disruption
AODA 19.1 Service Animals and Support Persons

POLICY HR 4.1.5 Accessibility

Attachments

Attachment 4.1.5 A - Notice of Temporary Disruption

Attachment 4.1.5 B - Customer Feedback Form

Attachment 4.1.5 C - Record of Customer Feedback

Attachment 4.1.5 D - Request Alternate Format or Communication Support

Acknowledgement & Agreement

I, _____, acknowledge that I have read and understood the Accessibility policy of the Corporation of the County of Northumberland. Further, I agree to adhere to this policy, and I understand that if I violate the procedures outlined in this policy, I may face corrective action, up to and including termination of employment.

Name (please print): _____

Signature: _____

Date: _____

Witness: _____