



Corporate Policy

1. Administration

01.3 Integrated Accessibility Standards Regulation Policy

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| Approved by: | _____ | on | _____ |
| Report No.: | _____ | Effective: | _____ |
| Reviewed: | May 2021 | Amended: | N/A |
| Next Review: | N/A | Note(s): | _____ |

I. Purpose

Under the *Accessibility for Ontarians with Disabilities Act, 2005* all municipalities must meet the requirements of accessibility standards established by regulation.

This policy establishes the Integrated Accessibility Standards Regulation in the areas of Employment, Information and Communication, Transportation for the Township of Warwick 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.

II. Scope and Responsibilities

This policy has been drafted in accordance with the Regulation and addresses how the Township of Warwick achieves accessibility through meeting the Regulation’s requirements.

It provides the overall strategic direction that the Township will follow to provide accessibility supports to persons with disabilities. It is in accordance with the Regulation and addresses how the Township of Warwick achieves accessibility through meeting the Regulation’s requirements, which include:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization’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.

III. Policy Statement and Organizational Commitment

The Township of Warwick is committed and guided by the four core principles of dignity, equal opportunity, integration, and independence 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, 2005. The Township will use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

IV. Definitions

Accessible Formats 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 arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

Communication 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;

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

Conversion Ready means an electronic or digital format that facilitates conversion into an accessible format.

Designated Public Sector Organization means every municipality and every person or organization listed in Column 1 of Table 1 of Ontario Regulation 146/10 (Public Bodies and Commission Public Bodies – Definitions) made under the *Public Service of Ontario Act, 2006*.

IAP means Individualized Accommodation Plan.

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

Internet website means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

Mobility Aid means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device means a cane, walker, wheelchair, scooter, or similar aid.

New Internet Website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Redeployment means that reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Township means the Corporation of the Township of Warwick.

Unconvertible means if it is not technically feasible to convert the information communications. It also means if the technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines (WCAG) means the World Wide Web Consortium recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines" (WCAG) 2.0.

V. General Provisions

i) Multi-Year Accessibility Plan

The Township of Warwick's Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA.

We will report annually on the progress and the implementation of the plan. The annual updates will be posted on our website and will be provided in accessible formats upon request. The plan will be reviewed and updated at least once every five years.

ii) Procuring or Acquiring Goods, Services or Facilities

The Township of Warwick will use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where is not practicable to do so, in which case, if requested, we will provide an explanation.

iii) Self-Serve Kiosks

The township of Warwick will have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-serve kiosks.

iv) Training

The Township of Warwick will ensure that training is provided to all employees and regular fee-for-service staff on the requirements of the accessibility standards. Training will be provided as soon as practicable. If any changes are made to this policy or the requirements training will be provided. We shall maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

VI. Information and Communication

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

If the Township 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, we will be obligated to provide the person that requires the information with:

- a) an explanation as to why information or communication is unconvertible
- b) include a summary of unconvertible information or communication (i.e. information in tables could be summarized by written text or by verbal updates, etc.)

i) Emergency Information

The Township of Warwick will prepare emergency procedures, plans or public safety information will be made available to the public and will be provided in an accessible format or with appropriate communication support as soon as practicable, upon request.

ii) Feedback

The Township of Warwick has processes in place for receiving and responding to feedback and will notify the public of these processes and ensure that the processes are provided in an accessible manner and with communication support upon request.

iii) Accessible Formats and Communication Supports

The Township of Warwick will 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) At a cost no more than the regular cost charged to other persons
- 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.

iv) Website Accessibility

The Township of Warwick will ensure that its website and web content conform to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG):

- By January 1, 2014, any new web content will conform with WCAG 2.0 Level A
- By January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA

v) Education, Training and Materials

The Township of Warwick will provide, if notification of need is given, educational or training resources or materials in an accessible format that takes into account the person's disability.

VII. Employment Standard

The requirements of the Employment Standard shall be met by the Township of Warwick as required in the Regulation.

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.

i) Recruitment and Retention

The Township of Warwick will notify employees and the public about the availability of accommodations 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, we shall consult with applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;
- Notify successful applicants of the policies for accommodating employees with disabilities.

ii) Employee Notification

The Township of Warwick will inform our employees of its policies used to support its 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 in policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

iii) Accessible Formats

Where an employee with a disability requests it, we 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 employees in the workplace; and
- Consult with the employee making the request in determining the suitability of an accessible format or communication support.

iv) Individual Accommodation Plan

The Township of Warwick will have in place a written process for the developing a documented individual accommodation plan for employees with a disability. Individual Accommodation Plans shall:

- If requested, include any information regarding accessible formats and communications supports provided

- If required, include individualized workplace emergency response information
- Identify any other accommodation that is to be provided

The process for the development of documented individual accommodation plans shall include the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
- The steps taken 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;

v) Return to Work

The Township of Warwick will develop and 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. The Township will also document the process.

The return to work process shall:

- Outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work;
- Use documented individual accommodation plans as part of the process.

vi) Performance Management, Career Development and Advancement, Redeployment

The Township of Warwick 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.

vii) Workplace Emergency Response Information

Warwick Township will 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 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 we shall provide the workplace emergency information to the person designated by the Township to provide assistance to the employee;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- 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.

VIII. 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. The Transportation standard applies to:

- Conventional transportation services, e.g., London Transit and the Toronto Transit Commission (TTC)

- Specialized transportation services, e.g., TTC's Wheel-Trans, and DARTS in Hamilton
- Other public transportation services, e.g., public school boards that offer transportation services to students and public transportation services offered by hospitals, colleges and universities
- Municipalities that licence taxicabs or that provide conventional transportation services
- Certain ferries

As the Township of Warwick is not involved in the delivery of the above, the transportation standards are not applicable to the Township of Warwick at this time. Further, the Province of Ontario's online AODA Compliance Wizard has indicated that the Transportation Standards are not applicable at this time in Warwick. The Township of Warwick will review the standards should the service provision of the municipality change and update this policy if required.

IX. Further Information

For more information on this policy, contact Amanda Gubbels, Administrator/Clerk of the Township of Warwick by e-mail at agubbels@warwicktownship.ca or by phone at 519-849-3926.