

CORPORATION OF THE TOWNSHIP OF McNAB/BRAESIDE

Accessibility for Ontarians with Disabilities Act, 2005

SECTION NAME Accessibility	POLICY Integrated Accessibility Standards Regulation (IASR)	POLICY NO.
SCOPE	EFFECTIVE DATE January 2014	PAGE 1 of 6
IMPLEMENTATION	REVISIONS	

Under the *Accessibility for Ontarians with Disabilities Act, 2005* all public and private sector organizations must meet the requirements of accessibility standards by regulation. This policy establishes the Integrated Accessibility Standards Regulation in the areas of Employment, Information & Communication and Transportation for the Township of McNab/Braeside 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.

POLICY

1. Scope and Responsibilities

- 1.1 This policy has been drafted in accordance with the Regulation and addresses how the Township of McNab/Braeside achieves accessibility through meeting the Regulation’s requirements.
- 1.2 It provides the overall strategic direction that we will follow to provide accessibility supports to Ontarians with disabilities. The requirements of the Regulation include:
 - 1.2.1 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;
 - 1.2.2 Incorporation of accessibility criteria and features when **procuring or acquiring goods, services, or facilities**;
 - 1.2.3 **Training**; and
 - 1.2.4 Other **specific requirements under the Information and Communication, Employment and Transportation Standards**.

2. Policy Statement and Organizational Commitment

- 2.1 The Township of McNab/Braeside is committed and guided by the four core principles of Dignity, Equal Opportunity, Integration and Full Inclusion, and supports the needs of persons as set out in the *Canadian Charter of Rights and Freedoms*, and the *Accessibility for Ontarians with Disabilities Act, 2005*.
- 2.2 The Township of McNab/Braeside shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

3. Definitions

- 3.1 “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;
 - 3.1.1 “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;
 - 3.1.2 “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*.
 - 3.1.3 “Small designated public sector organization” means a designated public sector organization with at least one but fewer than 50 employees.

PROCEDURE

4. General Provisions

4.1 Multi-Year Accessibility Plan

- 4.1.1 The Township of McNab/Braeside’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. The Township of McNab/Braeside will report annually on the progress and implementation of the plan, and we will post the information on our website and will provide it in alternative format upon request. The Plan will be reviewed and updated once every five years.

4.2 Procuring or Acquiring Goods, Services or Facilities

- 4.2.1 The Township of McNab/Braeside will incorporate 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 we will provide an explanation.

4.3 Training

- 4.3 The Township of McNab/Braeside will ensure that training is provided to all employees and regular fee for service staff on the requirements of the Standards referred to in the regulations on the Human Rights Code as it pertains to persons with disabilities.

Training will be provided as soon as is practicable. If any changes to this policy occur training will be provided. We will maintain a record of dates when training is provided and the number of individuals to whom it was provided.

5. Information and Communications Standard

5.1 Our organization will create, provide and receive information and communications in ways that are accessible to people with disabilities.

5.2 If our organization determines that it is not technically feasible to convert the information or communications or the technology to convert the information is not readily available we will be obligated to provide the person that requires the information with:

5.2.1 An explanation as to why the information or communications are unconvertible;
and

5.2.2 A summary of the unconvertible information or communications.

6. Emergency Information

6.1 If our organization prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

7. Feedback

7.1 Our organization has process 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. We will notify the public about the availability of accessible formats and communication supports.

8. Accessible Formats and Communication Supports

8.1 The Township of McNab/Braeside shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities:

8.1.1 Upon request in a timely manner that takes into account the person's accessibility needs due to disability; and

8.1.2 At a cost that is no more than the regular cost charged to other persons.

8.1.3 Consult with the person making the request and determine suitability of an accessible format or communication supports.

8.1.4 Notify the public about the availability of accessible formats and communication supports.

9. Website Accessibility

9.1 The Township of McNab/Braeside shall make their internet website and web content conform with the World Wide Web Consortium 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 with WCAG Level A. By January 1, 2021 all internet website and web content will conform with WCAG 2.0 level AA.

10. Employment Standard

- 10.1 The Employment Standard builds upon 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 employees and does not apply to volunteers and other non-paid individuals.

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

11. Recruitment and Retention

- 11.1 The Township of McNab/Braeside shall notify employees and the public about the availability of accommodations for applicants with disabilities:

- 11.1.1 During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- 11.1.2 If a selected applicant requests an accommodation we shall consult with applicant and provide or arrange for the provisions of a suitable accommodation that takes into account the applicants disability;
- 11.1.3 Notify successful applicants of the policies for accommodating employees with disabilities.

12. Employee Notification

- 12.1 The Township of McNab/Braeside shall inform its 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:

- 12.1.1 As required to new employees as soon as is practicable after they begin their employment;
- 12.1.2 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 disability.

13. Accessible Formats

- 13.1 In addition, and where an employee with a disability requests it, the Township of McNab/Braeside will consult with the employee to provide for arrange for the provision of accessible formats and communication supports for:

- 13.1.1 Information that is needed in order to perform the employee's job; and
- 13.1.2 Information that is generally available to employees in the workplace.
- 13.1.3 Consult with employee making the request in determining the suitability of an accessible format or communication support.

14. Individual Accommodation Plan

- 14.1 The Township of McNab/Braeside shall have in place a written process for the developing of a documented individual accommodation plan for employees with a disability. The process is to include:
- 14.1.1 The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
 - 14.1.2 Assessment on an individual basis;
 - 14.1.3 Identification of accommodations to be provided;
 - 14.1.4 Timelines for the provision of accommodations;
 - 14.1.5 The possible request of an evaluation by a medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
 - 14.1.6 A request from the employee for the participation of a representative from their bargaining agent where represented, or otherwise a representative from the workplace where the employee is not represented by a bargaining agent;
 - 14.1.7 The steps taken to protect the privacy of the employee's personal information;
 - 14.1.8 The frequency with which the IAP will be reviewed and updated, and the manner in which it will be done;
 - 14.1.9 The manner in which the reasons for the denial will be provided to the employee, if an individual accommodation plan is denied
 - 14.1.10A format that takes into account the employee's accessibility needs due to disability.
- 14.2 Individual accommodation plans shall:
- 14.2.1 If requested, include any information regarding accessible formats and communications supports provided;
 - 14.2.2 Individualized workplace emergency response information if required;
 - 14.2.3 Identification of any other accommodation that is to be provided.

15. Return to Work

- 15.1 The Township of McNab/Braeside 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 steps the municipality will take to facilitate the return to work and include an IAP.

16. Performance Management, Career Development and Advancement, Redeployment

- 16.1 The Township of McNab/Braeside will take into account the accessibility needs and/or individual accommodation plans of employees when:
- 16.1.1 Using performance management processes;
 - 16.1.2 Providing carper development and advancement information;
 - 16.1.3 Using redeployment procedures.

17. Workplace Emergency Response Information

17.1 The Township of McNab/Braeside will provide individualized workplace emergency response information to employees who have a disability:

17.1.1 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;

17.1.2 If the employee who receives an individual workplace response information requires assistance, and with the employees consent, we shall provide the workplace emergency information to the person designated by the Township of McNab/Braeside to provide assistance to the employee;

17.1.3 As soon as is practicable after becoming aware of the need for accommodation due to the employee's disability;

17.1.4 Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.

18. Transportation Standard

18.1 The Transportation Standard is not applicable to the Township of McNab/Braeside at this time. The Municipality does not currently licence or provide for public transportation.

19.0 Review Period

19.1 This policy shall be reviewed annually and will be revised in light of any legislative or organizational changes.

20.0 Regulatory Requirements

20.1 An Administrative Monetary Penalties scheme is being established under the AODA. The scheme will allow the Accessibility Directorate 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 AODA or the accessibility standard.