

Integrated Accessibility Standards Policy

Statement of Commitment

The Municipality of Brighton is committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

Purpose

This policy expresses the Municipality of Brighton's commitment to establish accessibility standards for information and communications, employment, transportation, the design of public spaces and customer service in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* and O. Reg. 191/11 Integrated Accessibility Standards.

Application

This policy applies to all Municipality of Brighton employees, volunteers and all other third parties who provide goods, services or facilities to the Municipality.

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 arrangement 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 needs.

AODA means the *Accessibility for Ontarians with Disabilities Act, 2005*.

Assistive Devices mean any auxiliary aid, tool, technology, or other mechanism that enable persons with disabilities to do everyday tasks and activities. They may include mobility aids such as canes, walkers, wheelchairs, hearing aids, computer software such as voice recognition programs, closed captioning, physical modifications in the built environment such as ramps and grab bars, and many other types of devices.

Barrier means anything that stops, impedes, prevents or causes difficulty for a person to obtain, use or benefit from a provider's programs, facilities or services. A barrier can be physical, attitudinal, technological, or related to information and communications.

Communication Support may include, but are not limited to, captioning, alternative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability, according to the Ontario Human Rights Code, 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”)

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.

Municipality means the Corporation of the Municipality of Brighton.

Regulation refers to O. Reg 191/11 Integrated Accessibility Standards.

Service Animal means an animal for a person with a disability that can be readily identified as one that is being used by the person for reasons relating to the persons disability, as a result of visual indicators such as the vest or harness worn by the animal, or the person provides documentation from a recognized regulated health professional confirming the person requires the animal for reasons relating to disability.

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

Unconvertible means information or communications where it is not technically feasible to convert the information or communications or the technology to do so is not readily available.

WCAG 2.0 means Web Content Accessibility Guidelines which are accessibility standards prepared by the World Wide Web Consortium.

General Provisions

Accessibility Advisory Committee

The Municipality has established an Accessibility Advisory Committee in accordance with Section 29 of the AODA. Duties of the committee are to:

1. Advise council about the requirements and implementation of accessibility standards and the preparation of accessibility reports and such other matters for which the council may seek its advice such as the Municipality's 5-Year Accessibility Plan,
2. Review site plans and drawings as described in Section 41 of the *Planning Act* as requested, and
3. Perform all other functions that are specific in the Regulation, including consulting on:
 - a. accessible design criteria for the construction, renovation or replacement of bus stops,
 - b. the availability of accessible on-demand taxicabs in the Municipality,
 - c. any new or redeveloped trails and providing consultation on the slope, need for and location of ramps, need for and location and design of rest areas, passing areas, viewing areas, amenities on the trail and any other pertinent features,
 - d. the construction of new or redeveloping existing outdoor play spaces for the needs of children and caregivers with various disabilities,
 - e. rest areas for new or when redeveloping existing exterior paths of travel, and
 - f. the construction of new or when redeveloping existing on-street parking spaces for accessible requirements.

Accessibility Policies

Section 3 of the Regulation outlines the Municipality's responsibility to develop, implement and maintain accessibility policies, including a statement of commitment, and to make the policies publicly available. The Regulation establishes accessibility standards for 5 areas which may, in time, require separate policies. These sections include:

1. Information and Communication
2. Employment

3. Transportation
4. Design of Public Spaces
5. Customer Service

Section 80.46 of the Regulation includes an additional requirement to establish policies regarding the provision of goods, services or facilities to persons with disabilities, incorporating the following principles:

1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.
3. Persons with disabilities must be given an opportunity equal to others to obtain, use and benefit from the goods, services or facilities
4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.

Section 80.46 further states that the policy should include reference to assistive devices that may assist person with disabilities to obtain, use or benefit from the services or facilities. The policy is available on the Municipality's website.

This policy will meet or exceed what is outlined in the Regulation. It will be reviewed regularly and in relation to any legislative or service changes. No changes will be made to this policy before considering the impact on people with disabilities and any policy of the Municipality that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, please direct your query to the Clerk's Department.

Accessibility Plans

According to Section 4 of the Regulation, the Municipality is required to establish, implement and maintain a multi-year accessibility plan, which outlines the Municipality's strategy to prevent and remove barriers and meet the requirements set out by the Regulation. This includes documenting procedures for preventative and emergency maintenance of accessible elements in public spaces and procedures for dealing with temporary disruptions when accessible elements required under the Design of Public Spaces Standards section of the Regulation are not in working order. The procedure outlining notice of temporary disruption of service is included as Attachment 1 to this policy.

The plan is posted on the website and provided in an accessible format if requested and, in collaboration with the Accessibility Advisory Committee, updated at least once every 5 years. A report of the status of the progress made on the plan will be completed and posted on the Municipality's website yearly.

Procuring or Acquiring Goods, Services or Facilities

The Municipality will continue to incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, including self-serve Kiosks, when practicable to do so. If not practicable, an explanation will be provided according to Section 5 and 6 of the Regulation.

Vendors responding to Requests for Proposal will be made aware of the Municipality's requirement for accessible deliverables to be made available to Council and the public such as reports, or they will be remediated at additional cost to the vendor.

Training

Training will be provided to all persons who are an employee of, volunteer with, those who assist in policy development or otherwise provide goods, services or facilities on behalf of the Municipality in accordance with the Regulation and the Human Rights Code. The training will be appropriate to each individuals' duties and completed as soon as practicable. A record of the training will be retained including dates and number of individuals trained.

Information and Communications

Sections 9-14 of the Regulation are regarding Information and Communications.

Accessible Formats and Communication Supports

Accessible formats of documentation, including emergency procedures, plans or public safety information, will be provided to the public in a timely manner at no additional cost than to those charged to other persons through consultation with the individual making the request. If documentation cannot be made accessible, an explanation to why it is unconvertible and a summary of the information in accessible format will be provided to the requestor. This includes documents provided through Part IV.2, Customer Service Standards in the Regulation as set out in Section 80.51.

All documentation provided on the website will be in accessible format and notice is provided via the Municipality's website that accessible documentation is available by request. All communications with persons with disabilities will be provided in ways that consider their disability. We will offer to communicate with customers by email or written text if telephone communication is not suitable to their communication needs or is not available.

We are committed to providing accessible invoices to all our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, or

by e-mail. We will answer any questions customers may have about the content of an invoice or any other document in person, by telephone or email.

Accessible Website and Web Content

The Municipality's website and web content will meet or exceed WCAG 2.0 level AA standards when possible and if not listed as an exception to the Regulation.

Exceptions

1. Products and product labels,
2. Unconvertible information or communications, and
3. Information that the Municipality does not control directly or indirectly through a contractual relationship, except as required under Sections 15 and 18.

Employment

Sections 20 to 32 of the Regulation regarding accessible employment apply only to employees of the Municipality and do not apply to volunteers or other unpaid individuals.

Accessible Supports for Current and Prospective Employees

Applicants for positions within the Municipality will be made aware of accessible accommodations during the recruitment process and will take into consideration the individual's specific needs.

All successful applicants and new employees will be made aware of accessible policies at the Municipality as well as any updated information throughout the course of their employment. The Municipality will provide employees with accessible formats of information required for the employee's position or information available to all employees in a timely manner.

Workplace Emergency Response Information

Individualized emergency response plans in accordance with Section 27 of the Regulation will be prepared for each employee with a disability which will be reviewed when the employee changes location within the Municipality and when accommodation plans and emergency response policies are reviewed. They will also be included in individual accommodation plans as outlined in Section 28 (3) of the Regulation.

Individual Accommodation Plans

Accommodation plans will be prepared and will include the following elements as outlined in Section 28 of the Regulation:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. 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.
4. 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 unit, or other representative from the workplace, where the employee is not represented by a bargaining agent in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Return to Work Process

For individuals returning to work from an absence related to disability, accommodations will be provided and documented. The process will include steps the Municipality will undertake and will use the individual accommodation plans as prepared.

Performance Management, Career Development and Advancement, Redeployment

The Municipality will take accessibility needs and individual accommodation plans into consideration for persons with disabilities in accordance with Section 30-32 of the Regulation for:

1. Performance management,
2. Career development and enhancement, and
3. Redeployment.

Transportation

Sections 33 to 80 of the Regulation refer to Transportation. The Municipality does not offer conventional or specialized transportation services other than those provided in partnership with Quinte Transit on behalf of Brighton residents.

The Municipality will consult with the Accessibility Advisory Committee concerning accessible design criteria for the construction, renovation or replacement of bus stops and the availability of accessible on-demand taxicabs in the Municipality.

Quinte Transit

The Municipality, in partnership with Quinte Transit, will provide specialized service to residents for medical services, employment, education, shopping, visiting, social events and recreation with medical appointments considered a priority. The service is available to persons who are physically or mentally challenged, unable to climb or descend stairs, unable to walk a distance of 175 meters or seniors who need transportation assistance. Service animals which provide assistance to their owners are allowed on vehicles.

Feedback regarding specialized service can be submitted through the Quinte Transit website.

Design of Public Spaces

The Municipality will consult the Regulation for all newly constructed or redeveloped public spaces in accordance with Sections 80.1 to 80.44 of the Regulation such as:

- a) Recreational trails,
- b) Beach access routes,
- c) Outdoor public use eating areas,
- d) Outdoor play spaces,
- e) Exterior paths of travel,
- f) Accessible parking,
- g) Obtaining services, and
- h) Maintenance.

The Municipality's procurement policies, with the inclusion of accessibility requirements, will ensure that accessibility barriers will be identified and prevented in all new construction projects.

Consultation with the Accessibility Advisory Committee will occur for all required sections of the Regulation such as any new or redeveloped trails, outdoor play spaces, rest areas for exterior paths of travel and accessible on-street parking.

Customer Service

The Municipality will meet or exceed Regulation Sections 80.45 to 80.51 as they pertain to accessible customer service as the Municipality is a provider of goods, services or facilities.

Assistive Devices

The Municipality is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. All persons with disabilities may provide their own assistive device for the purpose of obtaining, using and benefitting from the Municipality's programs, facilities and services provided they are used in a safe and controlled manner. Staff will be trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services and those that are provided and available in Municipal facilities such as public address systems, automatic door openers and the location of access ramps.

Service Animals and Support Persons

We are committed to welcoming people with disabilities who are accompanied by a service animal (unless excluded by other law, then an alternative means of assistance will be provided) on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others assisting the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter the Municipality's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

The Municipality may require a person with a disability to be accompanied by a support person when on Municipal premises, but only if a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises. For this purpose, fees will not be charged for support persons for admission to Municipal premises for any events where a fee is required.

Notice of Temporary Disruptions

The Municipality will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include, at a minimum, information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be given in accordance with Attachment 1 – Notice of Temporary Service Disruption Procedure.

Training for Staff

The Municipality will provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures as

outlined in Section 80.49 of the Regulation.

This training will be provided within 60 days after staff commences their duties and will include the following:

1. The purposes of the AODA and the requirements of the customer service standard,
2. How to interact and communicate with persons with various types of disability,
3. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person,
4. How to use equipment or devices on our premises that may help with the provision of goods, services or facilities to people with disabilities, and
5. What to do if a person with a disability is having difficulty in accessing the Municipality's goods, services or facilities.

Applicable staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures. Record of the training including participants and training date will be kept by the Municipality.

The content and specifics of the accessibility training will be documented and provided to any person by request. Notice of the availability of this information will be posted publicly.

Feedback Process

The ultimate goal of the Municipality is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated. An Invitation for Feedback and availability of our Integrated Accessibility Standards Regulation Policy will be posted at on our website, in our building lobbies and at our service counters.

Feedback regarding the way the Municipality provides goods, services or facilities to people with disabilities can be made by e-mail, verbally, written or by using the Feedback Form available on our website, in our building lobbies and at our service counters. Feedback regarding the feedback process is also welcomed.

All feedback will be directed to the Clerk's Department. Customers can expect to hear back in 5 days.

Rationale & Legislative Authority

Accessibility for Ontarians with Disabilities, 2005

Human Rights Code

O. Reg 191/11 Integrated Accessibility Standards

Notice of Temporary Service Disruption Procedure

Purpose

In accordance with the Accessible Customer Service Standards, part of Ontario Regulation 191/11 under the *Accessibility for Ontarians with Disabilities Act, 2005*, the Municipality of Brighton is required to give notice of temporary service disruptions in municipal facilities and services. This procedure will establish guidelines for providing disruptions in service to persons with disabilities.

Definitions

Service Disruption is a planned or unexpected interruption in Municipality of Brighton facilities or services.

Planned Service Disruption is a disruption known at least three days in advance.

Unplanned Service Disruption is a disruption without prior notice.

Information to be Included in Notice

1. Type of disruption
2. Reason for the disruption
3. Anticipated duration
4. A description of alternative facilities or service, if any, that are available
5. Contact information.

Manner of Notification

Planned Service Disruption

In the event of a planned service disruption, the following steps will be taken at least 2 days prior to the disruption:

1. Post signage on-site
2. Post a notice on the website
3. Provide notice on the Accessibility page of brighton.ca or other means appropriate for the situation
4. Verbally at the site of the disruption, and
5. Any other means necessary to provide notice.

Unplanned Service Disruption

In the event of an unplanned service disruption, the following steps will be taken as soon as possible after the disruption is identified:

1. Post signage on-site
2. Post a notice on the website
3. Provide notice on the Accessibility page of brighton.ca or other means appropriate for the situation
4. Inform appropriate staff to resolve the disruption
5. Verbally at the site of the disruption, and
6. Any other means necessary to provide notice.