



# The City of Woodstock Policy Manual

<b>Subject:</b>	<b>Accessibility</b>
<b>Policy Number:</b>	<b>A001</b>
<b>Revision:</b>	<b>03</b>
<b>Approved by Council:</b>	<b>February 9, 2009</b>
<b>Amended:</b>	<b>September 14, 2013</b>

## **Policy Statement**

The City of Woodstock is committed to providing equal treatment to people with disabilities with respect to the use and benefit of City services, programs, goods and facilities in a manner that respects their dignity and that is equitable in relation to the broader public. This commitment extends to residents, visitors and employees with visible or non-visible disabilities.

## **Purpose**

This policy is intended to provide the overarching framework to guide the review and development of other City of Woodstock policies, standards, procedures, By-laws and guidelines to comply with the standards developed under the Accessibility for Ontarians with Disabilities Act 2005, S.O. 2005, c. 11. (AODA).

## **Application**

This Policy applies to all City employees, volunteers and to any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of the City, in accordance with the legislation.

The City's Transit Services Division is committed to meeting the spirit and intent of AODA.

The Woodstock Public Library reports to a separate board and as such follows their own respective policy.

## **Principles**

City services, programs, policies, goods and facilities are to be available to people with disabilities in a manner that:

- Is free from discrimination;
- Reflects the principles of dignity and independence;
- Seeks to provide integrated services;
- Provides an opportunity equitable to others to obtain, use and benefit from the goods or services; and

- Takes into consideration a person's disability while respecting the dignity and independence of persons with disabilities.

### **Responsibilities**

The Clerk's Department is responsible for reviewing this Policy annually and recommending amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations. The City Clerk or designate shall provide advice and direction on the implementation of this Policy. Supervisors and managers shall ensure that they and their staff are familiar with and comply with this Policy.

### **Accessibility Office (Clerk's Department) is responsible for:**

- Collecting information about requests and feedback from departments;
- Monitoring compliance with this procedure on an annual basis; and
- Providing a summary of the requests and feedback to the Accessibility Advisory Committee at their regular meetings.

### **Directors are responsible for:**

- Creating and maintaining service free from discrimination toward persons with disabilities;
- Budgeting for the costs associated with accessible formats and communication supports of materials originating from their departments; and
- Monitoring situations where requests for accessible formats and communication supports have not been provided and determine ways to make the information more convertible in the future.

### **Managers and Supervisors are responsible for:**

- Creating and maintaining service free from discrimination toward persons with disabilities;
- Ensuring employees are aware of this procedure and are logging requests and feedback that are received by their departments with the Clerk's Department;
- Tracking costs associated with requests;
- Ensuring employees are providing residents with the requested accessible format and communication support;
- Ensuring that staff provide residents with an explanation as to why information or communications are unconvertible; and
- Overseeing the provision of a summary of the unconvertible information or communication support to the resident.

### **Monitoring/Contraventions**

Failure to comply with the AODA regulations can result in administrative penalties. Supervisors and managers shall monitor current practices to ensure compliance. Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

## **Policy Requirements**

### **General Standards**

The City of Woodstock is a large designated public sector organization under AODA and is committed to meeting the accessibility needs of people with disabilities.

### **Accessibility Advisory Committee**

The City of Woodstock has established an advisory committee with a majority of individuals whom are persons with disabilities. The committee shall advise Council about the requirements and implementation of AODA accessibility standards, preparation of accessibility reports, including access for persons with disabilities to a building or premises, and other matters for which Council may seek advice.

### **Establishment of Accessibility Plans and Policies**

The City shall produce a Multi-Year Accessibility Plan. The plan will be posted on the City's website and shall be made available in an accessible format and with communication supports, upon request. Progress on the plan will be provided to Council annually in the City of Woodstock's Status Report. The Accessibility Plan shall be reviewed and, if necessary, updated at least once every five (5) years. The City of Woodstock maintains policies governing how the City shall meet its requirements under AODA, and the City will provide policies in an accessible format, upon request.

### **Accessible Formats and Communication Supports**

Except as otherwise provided by AODA, the City of Woodstock shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs, and at a cost that is no more than the regular cost charged to other persons, in accordance with the Accessible Formats and Communication Supports Procedures (see Schedule B).

This does not apply to products and product labels, unconvertible information or communications and information that the City does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the department shall provide the person requesting the information or communication with:

- (a) an explanation as to why the information or communications are unconvertible;
- (b) a summary of the unconvertible information or communications.

### **Procurement of Goods, Services, Facilities and Kiosks**

When procuring goods, services, self-service kiosks or facilities, the City shall incorporate accessibility criteria and features, unless it is not feasible (practicable). If not practicable, the City shall provide an explanation, upon request (reference By-law 8040-04).

### **Feedback**

Feedback on how services were delivered to people with disabilities shall be invited, forwarded to the appropriate personnel, responded to, documented and tracked. Feedback shall be collected by phone at 519-539-1291, TTY (Teletypewriter) at 519-539-

7268, by e-mail to [accessibility@cityofwoodstock.ca](mailto:accessibility@cityofwoodstock.ca) and in person at any of the City's service locations.

Feedback shall be accepted in accessible formats and with other communication supports as required. Feedback given to any city service locations, person or department shall be forwarded to the City Clerk's Department who shall investigate the feedback with the appropriate Department Head and ensure that the person who provided the feedback receives a response within seven days. If deemed appropriate by the city clerk or his or her designate, the feedback will be considered by the Woodstock Accessibility Advisory Committee.

### **Documentation**

Documentation that describes this Policy and each of its requirements shall be maintained on the City's website [www.cityofwoodstock.ca](http://www.cityofwoodstock.ca) and provided to individuals, upon request, in the appropriate format or communication support.

## **Customer Service Standards**

### **Statement of Principle**

Ontario Regulation 429/07 made under the AODA came into force on January 1 2008. This Regulation establishes accessibility standards for customer service. The City of Woodstock is committed to meeting the standards set out in the Regulation.

## **Administration**

### **Policies, Practices and Procedures**

The City of Woodstock provides goods or services to members of the public, including those with disabilities. The City shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the same principles used to govern the City of Woodstock's overarching accessibility policy.

### **Use of Service Animals and Assistive Devices**

If a person with a disability is accompanied by a guide dog or other service animal, the City shall ensure that the person is permitted to enter the premises with the animal and allowed to keep the animal with him or her unless the animal is otherwise excluded by law from the premises.

If a service animal is excluded by law from the premises, the City shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the City's goods or services.

This applies in equal measure to assistive devices. Customers with disabilities shall be permitted to enter the premises with their mobility aids.

### **Use of Support Persons**

If a person with a disability is accompanied by a support person, the City shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

The City may require a person with a disability to be accompanied by a support person when on the 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 other on the premises.

If an amount is payable by a person for admission to the premises or in connection with a person's presence at the premises, the City shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person.

### **Notice of Temporary Disruptions**

If, in order to obtain, use or benefit from a City of Woodstock goods or services, persons with disabilities usually use particular facilities or services of the City and if there is a temporary disruption in those facilities or services in whole or in part, the City shall give notice of the disruption to the public.

Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

Notice shall be given by posting the information at a conspicuous place on premises owned or operated by the City of goods or services, by posting it on the City's website or by such other method as is reasonable in the circumstances.

## **Information and Communication Support Standards**

### **Communication**

When communicating with a person with a disability, City employees, volunteers and third party contractors shall do so in a manner that takes into account the person's disability. Guidelines for communicating with people who have various types of disabilities are provided in the City of Woodstock Orientation training of which copies are available upon request.

### **Terminology**

When referring to people with disabilities, City employees, volunteers and third party contractors shall use terminology that adheres to guidelines provided in the City of Woodstock's Accessibility Training for Customer Service.

### **Accessible Websites and Web Content**

Internet websites and web content controlled directly by the City of Woodstock or through a contractual relationship that allows for modification of the product shall conform 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 AODA Integrated Accessibility Standards effective January 1st 2013.

### **Emergency Procedures, Plans and Information**

The City shall provide all existing public emergency procedures, plans and public safety information, upon request in an accessible format or with appropriate communication supports in a timely manner.

## **Employment Standards**

### **Recruitment**

The City of Woodstock shall post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. The City shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants shall be notified about the City's policies for accommodating employees with disabilities as part of their offer of employment.

### **Employee Supports**

The City will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. The City will provide this information to new employees as soon as practicable after they begin their employment. The City will also provide updated information to all employees 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.

Accessible Formats and Communication Supports are available for employees, upon request. The City shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace.

The City will consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **Workplace Emergency Response Information**

If an employee's disability is such that workplace emergency response information is necessary, and the City is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when the City reviews its general emergency response plan.

### **Documented Individual Accommodation Plans**

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities, if requested. These plans shall include information regarding accessible formats and communications supports. If requested, the plans shall include individualized workplace emergency response information.

### **Return to Work Process**

The City shall have in place a documented return to work process for employees returning due to disability and requiring disability-related accommodations. This return

to work process will outline the steps that the City may take to facilitate the return to work.

### **Performance Management and Career Development and Redeployment**

The City shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

All of the aforementioned employee standards shall be in place by no later than January 1st 2014.

## **Transportation Standards**

### **Taxicabs**

Owners and operators of taxicabs licensed by the City of Woodstock are prohibited from charging additional fares or fees to persons with disabilities than for persons without disabilities and for the storage of mobility aids or mobility assistive devices. The City requires that taxicabs licensed by the City make available vehicle registration and identification information in an accessible format.

### **Training**

All City employees, volunteers and third parties developing policies, practices, or procedures, or providing goods and services on the City's behalf shall be required to undergo training on the requirements of AODA accessibility standards and on the Human Rights Code as it pertains to persons with disabilities. The training provided shall be appropriate to the duties of the employee, volunteer or third party. Training shall take place as soon as is practicable and upon completion, the City shall keep a record of the training provided including the dates on which accessibility training took place.

The customer service section of the training shall include a review of the requirements of the Regulation and instruction about the following matters:

1. How to interact and communicate with persons with various types of disability.
2. 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.
3. How to use equipment or devices available on the City's premises or otherwise provided by the City that may help with the provision of goods or services to a person with a disability.
4. What to do if a person with a particular type of disability is having difficulty accessing the City's goods or services.
5. The training must be provided to each person as soon as practicable after he or she is assigned the applicable duties.
6. Training must also be provided on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.

## Schedule A 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.

**Communications** - means the interaction between two or more persons or entities, or any combination 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 and other supports that facilitate effective communications.

**Conversion ready** - an electronic or digital format that facilitates conversion into an accessible format.

**Disability** – is defined, per Section 2 of the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Human Rights Code, R.S.O. 1990, c. H.19, as follows:

- 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.”

**Electronic Text** – presentation of information in order to enable various computer programs to convert the information into a “readable” format. All illustrations or graphical information is explained fully in text.

**Information** - includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning. The information and communications standards do not apply to the following:

1. Products and product labels.
2. Unconvertible information or communications.
3. Information that the City does not control directly or indirectly through a contractual relationship.

**Kiosk** – 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.



**Service Animals** – are defined, per Section 4(9) of the Accessibility Standards for Customer Service, O. Reg. 429/07, as follows:

“an animal is a service animal for a person with a disability:

- a. if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- b. if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.”

**Support Person** – is defined, per Section 4(8) Accessibility Standards for Customer Service, O. Reg. 429/07, as follows:

“a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.”

**Unconvertible** - information or communications are unconvertible if it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available.

## **Schedule B**

# **Accessible Formats and Communication Supports procedures**

### **Application**

This procedure applies to City employees, volunteers and other persons or organizations that provide goods, services or facilities to the public or other third parties on behalf of the City, in accordance with the Integrated Accessibility Regulation developed under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, S.O.2005, c.11. and in support of the City of Woodstock Accessibility Policy.

The procedures apply to all materials and communications produced by the City of Woodstock for release to the public whether produced in house or on behalf of the City (i.e. consultant reports). It does not apply to unconvertible information and information that the City does not control directly or indirectly through a contractual relationship.

Each publication should be produced in such a way as to reduce or eliminate barriers in the original document. Adaptation to another format can be accommodated easily and quickly when accessibility is considered during the development.

### **Procedure Description**

#### **Notification**

The City will advise the public of the availability of accessible formats and communications supports by means of the following:

- A link on all City websites to the Accessible Formats and Communication Supports request form;
- Signage at every public service counter advising of the availability of Accessible formats and Communication Supports, if requested;
- Or by such other method as is deemed reasonable by the city clerk or his or her designate in the circumstances.

#### **Processing Requests**

Requests for an accessible format or communication support can be received by staff in person, by phone/TTY or by electronic formats such as emails or service requests. Upon receipt of a request, staff will complete the Online Request Form which is forwarded to the Clerk's Department for record keeping purposes. The request is to be responded to by the appropriate operational staff. A direct link to this form is provided on the accessibility page of [cityofwoodstock.ca](http://cityofwoodstock.ca).

All City staff shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons.

#### **Timeframe**

The timeframe for the conversion process of a document into an accessible format, or the provision of a communication support, can vary depending on the media chosen, the size, complexity, quality of source documents, and the number of documents to be converted. Documents shall be returned in a timely manner depending on the factors previously noted.

If the document being requested is the subject of a public consultation or has a set timeframe for public comment, the timeframe for document conversion and distribution must be taken into consideration.

### **Cost of Conversion**

When a member of the public requests a City document in an accessible format or information with a communication support, the department of origin is responsible for the cost of conversion, materials and distribution of information. If the materials are directly related to the work of an Advisory Committee, costs will be the responsibility of City Clerks.

Once the appropriate format or support is determined with the requestor, staff shall provide or arrange for the provision of the accessible formats and/or communication support for persons with disabilities.

If a staff member determines that information is unconvertible, they shall, in consultation with their manager, provide the person requesting the information or communication with:

- a. a written explanation as to why the information or communications are unconvertible; and,
- b. a summary of the unconvertible information or communication.

The Accessibility Office is available for consultation to help determine if information can be converted.

### **Common accessible formats**

Some of the most common accessible formats are (but not limited to):

- HTML or electronic text version on line that meet the WCAG 2.0 level A or AA;
- Text saved as a Word document;
- Large Text;
- Plain language versions; and
- Braille.

Common communication supports are (but not limited to):

- Screen Reader software (eg: BrouseAloud on Woodstock website);
- Verbal explanation of a written document;
- Video Captioning, transcripts;
- Alternative and augmentative communication supports such as an FM loop system or Communication Access Realtime Translation (CART); and
- Sign language interpretation.

## **Enquiries**

For further information regarding this procedure, contact:  
City Clerk's Department  
[accessibility@cityofwoodstock.ca](mailto:accessibility@cityofwoodstock.ca)

<b>Revision Date</b>	<b>Rev #</b>	<b>Particulars</b>
February 19, 2009	00	Issue Date
July 12, 2012	01	
April 14, 2013	02	Council approved GA022 – A001
September 14, 2013	03	Combine A001 & A005