

Accessibility Policy

Category: Legislated Policy Department: Human Resources

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Organizational Commitment and Policy Statement

The Corporation of the City of Cornwall (hereinafter "the City" or "Cornwall") is committed to the providing accessibility to people with disabilities with respect to the use of its services, programs, and facilities in a manner that respects their dignity and independence, and that is equitable in relation to the broader public.

The City of Cornwall is also committed to giving people with disabilities the same opportunity to access its services, allowing them to benefit from the same services, in the same place and in a similar way as others.

The City of Cornwall is committed to meeting the needs of its clients, including people with disabilities, and will do so in a timely manner by preventing and removing barriers to accessibility in (1) customer service (2) information and communication (3) employment (4) the built environment (5) transportation.

Purpose

The *Integrated Accessibility Standards* under the AODA, 2005 requires organizations to create a written accessibility policy and make them publicly available. This policy is intended to provide an overarching framework to guide the review and development of other related programs, procedures to comply with the standards developed under the *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11* (AODA) and the *Integrated Accessibility Standards, O. Reg. 191/11* (IAS).

Scope

This policy applies to all persons including residents, members of the public, employees, Mayor, Members of Council, agents, contractors, consultants, volunteers, or otherwise.

The policy extends to those who participate in developing the City's policies, practices and procedures governing the provision of goods and services to members of the public or other third parties.

Legislative and Administrative Authorities

This policy is in adherence to the following:

- Accessibility for Ontarians with Disabilities Act (AODA), 2005, S.O. 2005, c.11 (AODA)
- Accessibility Standards for Customer Service, O. Reg. 429/07
- AODA, Integrated Accessibility Standards Regulation, O. Reg. 191/11
- Ontario Human Rights Code, R.S.O. 1990, c.H.19

Definitions

Accessible Formats: are the alternate formats or ways of presenting printed, written, or visual material so that people with disability can access the information. This includes but is not limited to large prints, recorded audio, closed captions etc.



Accessibility Plan: a plan that describes the actions an organization will take to prevent and remove barriers and when it will do so.

Accessibility for Ontarians with Disabilities Act (the Act): is an act that was passed in 2005 by the Ontario Government, with the mandate of making Ontario accessible by 2025.

Barrier: means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice.

Communication Supports: are ways for people who cannot access verbal or audio information to receive it visually or ways for people who are non-verbal to communicate with people who speak. This may include, but are not limited to, captioning, alternative, and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

The City or Cornwall: means The Corporation of the City of Cornwall.

Disability: is defined, per Part 1 (2) of the AODA as follows:

- means 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
- a condition of mental impairment or a developmental disability
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder
- or an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

Individual Accommodation Plan: A formal way of recording and reviewing the workplace-related accommodations that will be provided to an employee with a disability. The plan includes any information regarding accessible formats and communications supports provided (if required), individualized workplace emergency response information, details of how and when accommodations will be provided and identify any other requirements.

Integrated Accessibility Standards Regulation (now referred to as the Regulation): this regulation applies to all Ontario organizations that provide goods, services or facilities to the public or to other organizations and have at least one employee.

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 or similar aid.

Practicable: means as soon as possible given all of the circumstances.



Service Animals: is defined by Section 80.45 (4) of the *AODA Customer Service Standards* (O.Reg 165/16) as an animal is a service animal for a person with a disability if 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 the person provides documentation from one of the following regulated health professional confirming that the person requires the animal for reasons relating to the disability:

- A member of the College of Audiologists and Speech Language Pathologists of Ontario
- A member of the College of Chiropractors of Ontario
- A member of the College of Nurses of Ontario
- A member of the College of Occupational Therapists of Ontario
- A member of the College of Optometrists of Ontario
- A member of the College of Physicians and Surgeons of Ontario
- A member of the College of Physiotherapists of Ontario
- A member of the College of Psychologists of Ontario
- A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person: as defined by the *Accessibility for Ontarians with Disabilities Act, 2005* shall mean any person, whether a paid professional, volunteer, family member or friend 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.

Accessibility Advisory Committee: is a committee with the primary purpose of consulting with and providing advice to Council on the City's annual accessibility plan for the City of Cornwall. This committee is also responsible for reviewing and advising Council on accessibility issues.

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

Roles and Responsibilities

Accessibility is a shared responsibility, and everyone has a part to play in making the City accessible to residents, members of public, employees, and co-workers, as described in the following roles and responsibilities.

Employees, Volunteers and Third Parties

All employees and other persons acting on behalf of the City must:

- Have thorough knowledge of and maintain compliance with this Policy;
- Be familiar with their rights and responsibilities under this Policy:
- Prevent accessibility barriers by including accessibility considerations in the development of goods, services, and facilities;
- Participate in identifying accessibility barriers and planning for barrier removal;
- Provide a welcoming environment for people with disabilities, including any person with a disability using assistive devices or accompanied by a support person or service animal;



- Communicate with persons with disabilities in a manner that takes into account their disability;
- Provide information and communications in accessible formats upon request, or with communication supports, and to consult with the requestor about their preferred format;
- Facilitate the process of receiving and responding to feedback about the manner that the City provides goods, services, and facilities to persons with disabilities, and ensure all feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports, upon request;
- When serving customers that have competing accommodation needs, make every effort to meet the needs of all individuals according to the Ontario Human Rights Code (opens in new window) and the City's Accommodation Policy;
- Request support from a supervisor, manager, or the General Manager of Human Resources when accommodation requests are outside their area of responsibility, or beyond their capacity;
- Complete mandatory training on the AODA, the Human Rights Code and providing customer service to people with disabilities, as well as any additional training appropriate to the duties of their role.

Supervisors and Managers

In addition to the roles and responsibilities as an employee, individuals with management and supervisory roles must:

- Provide leadership in building an inclusive and accessible environment for the public and employees;
- Facilitate requests for accommodation by members of the public and employees with disabilities in a timely manner, to the point of undue hardship, in accordance with the Ontario human rights code (opens in new window) and the city's accommodation policy;
- Prevent barriers by including accessibility considerations in the development of new policies, practices, procedures, or by-laws;
- Ensure that the policy is communicated to all city employees and those acting on behalf of the city;
- Promote awareness of the policy within their area of responsibility;
- Monitor current practices and ensure that management and staff are held accountable for their responsibilities under the policy;
- Act on non-compliant issues within their area of responsibility;
- Ensure staff, volunteers and persons who participate in developing city policies complete mandatory training requirements on the *Accessibility For Ontarians with Disabilities Act*;
- Ensure volunteers providing goods, services, and facilities on behalf of the City have been provided training, by the City.

Directors and General Managers

The City's Directors and General Managers must:

 Ensure resources are budgeted for identifying and preventing accessibility barriers (including attitudinal, systemic, information, communications, and technology, built environment and public space barriers) and for planning for barrier removal;



- Provide oversight for the implementation of this Policy and compliance with AODA within area of responsibility;
- Provide AODA compliance assurance when required.

Human Resources

The City's Human Resources representatives must:

- Ensure that all responsible workplace parties fulfil their responsibilities as it related to accessibility;
- Provide guidance to management and senior management for being compliant with the requirements of the legislation under *Accessibility For Ontarians with Disabilities Act*;
- Ensure that all employees have completed the required accessibility training, and all new hires are enrolled for completion of this training within 30 days of being hired;
- Monitor current practices and ensure that management and staff are held accountable for their responsibilities under the policy;

Accessibility Advisory Committee

The mandate of the committee is to:

- Provide advice to City Council on the requirements and implementation of AODA, accessibility standards, and other matters for which Council may seek advice;
- Provide consultation to the Office of the City Clerk in preparation of the Accessibility compliance reports;
- Coordinate the immediate and ongoing information sharing in various formats to persons
 with disabilities, etc. and to the public at large regarding issues faced by persons with all
 types of disabilities and regarding the work undertaken by the AAC;
- Review the access for persons with a disability to buildings, structures and premises (or parts thereof) that the City purchases, constructs, significantly renovates, leases or funds for compliance with legislation;
- Perform other functions specified in the IASR, including to be consulted on development of the Multi-Year Accessibility Plan;
- Provide advice to the City on compliance with the accessibility standards in the Integrated Accessibility Standards Regulation for services such as:
 - The proportion of on-demand accessible taxicabs required in the community.
 - Advice on the design and placement of rest areas along the exterior path of travel when building new or making major changes to existing exterior paths of travel.
 - Advice on the accessible features for recreation trail prior to new construction or making major changes to existing recreational trails.
 - Advice on the needs of children and caregivers with various disabilities in their community when building new or making major changes to existing outdoor play spaces.
 - Location and design of accessible on-street parking spaces when building new or making major changes to existing on-street parking spaces.



- Review the site plans and drawings described in <u>section 41 of the *Planning Act*</u> that the committee selects:
- Provide advise to the City on the implementation, and effectiveness of the City's Five-year Accessibility Plan to ensure that it addresses the identification, removal and prevention of barriers to persons with disabilities in City's by-laws, and all policies, programs, practices and services;
- Provide advice to City Council on the prevention and elimination of barriers faced by
 persons with disabilities in order to achieve accessibility with respect to City by-laws,
 policies, goods, services and programs, employment, facilities, buildings, structures, and
 premises;
- Partner with external bodies to help create awareness and provide advise to such external bodies to assist with identification, prevention, and removal of barriers to the participation of persons with disabilities in public life;
- Advance the achievement of social, cultural, and economic well-being of persons with disabilities.

Office of the City Clerk

The City Clerk is responsible for:

- Promoting awareness of the Policy and for reporting compliance through accessibility compliance reports to the Province, in accordance with AODA reporting deadlines, with support from Human Resources and any another Department as required;
- Review and Update the Accessibility Policy as needed to be compliant with changes in legislation or whenever there are changes to the City's practices or procedures;
- Liaison with the responsible party and provide consultation for establishing the relevant procedures, standards, and guidelines to ensure all internet websites and web content is accessible in consultation with Accessibility Advisory Committee, Managers and Directors;
- Provide consultation to managers for conversion of information or communication into the accessible format as needed;
- Respond to any queries relating to City's compliance with the *Accessibility For Ontarians* with Disabilities Act or relating to this policy and related procedures.

General Provisions

The City of Cornwall's Statement of Organizational Commitment gives guidance to the delivery of City's goods and services to people with disabilities, in compliance with requirements of provincial legislation.

Establishment of Accessibility Plans and Policies

The City of Cornwall is committed to maintaining this policy and associated plans, and procedures and will provide these documents in an accessible format upon request. Furthermore, Cornwall shall produce a multi-year accessibility plan that establishes, implements, maintains, and documents the phased-in strategy to prevent and remove barriers as well as addressing current and future requirements of the AODA. Each year, a status report on the progress of measures taken to implement the multi-year accessibility plan will be



prepared and posted publicly. The accessibility plan will be reviewed by the Accessibility Advisory Committee and approved by the City Council at least once every five years. In addition, the plan will be posted on the City's website and upon request by a member of the public with a disability, the City of Cornwall will consult with the resident to provide or arrange for the provision of suitable accessible formats and communication supports.

Accessibility in Procurement, Goods, Services, Facilities and Kiosks

When procuring or acquiring goods, services, facilities or self-serve kiosks, the City shall incorporate accessibility design criteria and features, unless it is not feasible or practicable. If not practicable, the City of Cornwall shall provide an explanation, upon request.

General Training Requirements

The City of Cornwall will ensure that training is provided to all employees and volunteers, and others who are involved in developing the organization's policies and in providing goods, services, or facilities on behalf of the organization on the requirements of of the AODA and the Integrated Accessibility Standards and on the Ontario Human Rights Code as it pertains to persons living with disabilities. The training shall be appropriate to the duties of the employee, volunteer or third party. Training will be provided as soon as practicable. Training shall take place at time of hire and when any changes are made to this policy or the requirements. The City shall maintain a record of everyone who completes the training and of the date that the training was completed.

Information and Communication Standards

The City of Cornwall commits to communicating with people with disabilities in ways that takes into account their disabilities and will work with each individual to determine what method of communication works best for them.

Cornwall is obligated to provide or arrange for accessible formats and communication supports for persons with disabilities:

- upon request, in a timely manner that takes into account the persons' accessibility needs due to disability;
- at a cost that is no more than the regular cost charged to other persons;
- consult with the person making the request and determine the suitability of an accessible format or communication support;
- notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

The City of Cornwall commits to creating, providing, and receiving information and communications in accessible formats to persons with disabilities. These accessible formats and communication supports will be provided in a timely manner and in a way that takes into account the individual needs of a person with a disability.

The City has a process for receiving and responding to feedback and the process is accessible to persons with disabilities, upon request. Employees will communicate with people with disabilities in ways that take into account their disability. When asked, the management will



provide information about our organization and its services, including public safety information, in accessible formats or with communication supports.

The City of Cornwall will consult with the person making the request to determine the suitability of an accessible format or communication support. Such accessible documents and communication supports will be provided at a cost no greater than the regular costs charged to others. If, in consultation with the Office of the City Clerk the information or communication is determined to be unconvertible within reasonable timeframe, the City must provide the person requesting the information or communication with:

- an explanation as to why the information or communications are unconvertible, and
- a summary of the unconvertible information or communications.

Emergency Plans, Procedures, and Information of Public Safety

The City of Cornwall will, upon request, provide emergency procedure, plan and public safety information in an accessible format or with communication support, as soon as practicable.

Accessible Websites and Web Content

The City of Cornwall will ensure the City's website and web content conforms to the World Wide Web Consortium Web Content Accessibility Guidelines WCAG 2.0 Level AA. The City of Cornwall's Clerk's Department, in consultation with Accessibility Advisory Committee, Managers and Directors are responsible for establishing and maintaining procedures, standards and guidelines to ensure all internet websites and web content is accessible.

Feedback on available formats and communication supports

The City of Cornwall will ensure that the processes for receiving and responding to feedback are accessible to people with disabilities. Upon request, accessible formats or communication supports will be provided or arranged. Cornwall will notify the public about the availability of accessible formats and communication supports.

Employment Standards

The City of Cornwall will foster an inclusive workforce and provide equitable treatment and accommodation to ensure a barrier-free employment. The requirements in this section apply only to employees of the City of Cornwall. Volunteers and other non-paid individuals are not captured under this section. This section addresses Cornwall's requirements of the IASR Employment Standards under the AODA.

Recruitment, Assessment and Selection

The City of Cornwall is committed to fair and equitable consideration of candidates during the recruitment, assessment, and selection process. The City of Cornwall 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, Cornwall shall consult with the applicant
 and provide or arrange for the provision of a suitable accommodation that takes into account
 the applicant's disability; and
- notify successful applicants of the policies for accommodating employees with disabilities.

In cases where accommodations due to disability are requested, the City of Cornwall will consult with the individual and provide or arrange for suitable accommodations in a manner that considers the applicant's disability needs. Accommodations will be provided with respect to the materials or processes used in recruitment. When making offers of employment, Cornwall will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Available Supports

City of Cornwall will 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 disability:

- as required to new employees as soon as practicable after they begin their employment;
 and
- 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.

Accessible Formats and Communication Supports for Employees

Where an employee with a disability requests it, the City 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.

Workplace Emergency Response Information

The City of Cornwall will provide individualized emergency response information to employees with a disability who identify potential accessibility barriers when responding to emergency situations.

If the employee requires assistance, and with their consent, the City of Cornwall will provide the individualized emergency response information to the person(s) designated to provide assistance. Cornwall will provide the information as soon as practicable after it becomes aware of the need for accommodation due to the employee's disability.

The City of Cornwall will review the individualized workplace emergency response information:

- When the employee moves to a different location in the organization;
- When the employee's overall accommodation needs or plans are reviewed or changed; and
- When the employer reviews or changes its general emergency response policies.



Documented Individual Accommodation Plans

Cornwall has a written process in place for developing a documented individual accommodation plan for employees with a disability. This process includes:

- the employee's participation in the development of the individual accommodation plan:
- assessment on an individual basis;
- identification of accommodation to be provided;
- timelines for the provision of accommodations;
- the City of Cornwall may request an evaluation by a medical or other expert, at its expense, to assist with determining accommodation and how to achieve accommodation:
- the employee may request the participation of a representative from the bargaining unit where represented, or otherwise a representative from the workplace where the employee is not represented by a bargaining agent;
- outlining steps taken to protect the privacy of the employee's personal information;
- frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- if denied, the reasons for denial are to be provided to the employee;
- a format that takes into account the employee's disability:
- if requested, any information regarding accessible formats and communication supports provided; and
- identification of any other accommodation that is to be provided.

Return to Work Process

The City of Cornwall maintains a documented return to work process for employees returning to work following an illness or injury where disability-related accommodations are required in order to return to work. The City will also maintain a documented return to work process for employees who were away on leave of absence and require disability-related accommodation in order to return to work. The return-to-work process outlines the steps the City of Cornwall will take to facilitate the return to work and will include a documented individual accommodation plan as part of the process.

The return-to-work process does not replace or override any other return to work process created by or under any other statute including Occupational Health and Safety Act, Worker's Compensation Act etc.

Performance Management, Career Development, and Redeployment

The City of Cornwall will ensure employees with disabilities or individual accommodation plans are considered and treated fairly in matters related to performance management, career development and advancement, and redeployment plan.

Design of Public Spaces (Built Environment)

The City of Cornwall shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) when undertaking new construction and redevelopment of public spaces in the following areas:



- Recreation trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces
- Accessible parking
- Obtaining services
- Service-related elements like service counters, fixed queueing lines and waiting areas
- Maintenance of accessible elements

The City of Cornwall has procedures in place to prevent service disruptions to the accessible parts of our public spaces.

Transportation Standards

The City of Cornwall intends to make it easier for people to travel including persons with disabilities, older Ontarians and families traveling with children in strollers. Cornwall has taken a proactive and inclusive approach to accessible transit.

As a municipality, Cornwall will:

- consult with the City's Accessibility Advisory Committee, the public and persons with disabilities in the development of accessible design criteria in the construction, renovation, or replacement of bus stops/shelters, including steps to meet the goal of accessible stops/shelters;
- consult with the City's Accessibility Advisory Committee, persons with disabilities and the
 public to determine proportion of accessible taxis required in the community, including steps
 to meet the need;
- ensure taxi services do not charge a higher fee or an additional fee to persons with disabilities:
- ensure taxi services do not charge a fee for storage of assistive devices; and
- ensure taxi services have appropriate information displayed on the rear bumper and available in an accessible format to passengers.

The City of Cornwall's Accessibility Plan will include progress made by the City to meet the accessible taxi service needs of the community and provide accessible bus stops/shelters. The City of Cornwall is committed to providing accessible conventional transit, specialized transit and community transit services in accordance with the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act through the development and implementation of policies, practices, procedures, resources, equipment and training in the provisions outlined in the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act.

Customer Service Standards

The City of Cornwall is committed to providing consistent customer service to persons with disabilities by putting into practice these four key principles:

- Dignity
- Independence



- Integration
- Equal Opportunity

Use of Service Animal

The City of Cornwall is committed to welcoming visiting persons with disabilities who are accompanied by a service animal on the parts of its premises that are open to the public and other third parties. If a visiting 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 to keep the animal with them unless the animal is otherwise excluded by law from the premises.

If a service animal is excluded by law from the premises or it is deemed unsafe for a visiting person with a disability to be accompanied by a guide dog or other service animal, 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 by bringing goods or services to the person in a part of the premises where the animal is not restricted or by offering a safe location where the service animal can wait, if the person is able to be separated from the animal while obtaining the service, and offering assistance to the person with a disability while they are separated from the service animal.

The City shall ensure that all staff, volunteers, and other persons dealing with the public are properly trained in how to interact with visiting persons with disabilities who are accompanied by a service animal. If it is not readily apparent that the animal is used by the visiting person for reasons relating to their disability, the City has the right to request a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

A visiting person with a disability who is accompanied by a service animal must maintain care and control of that animal at all times. If a customer or a staff member has an allergy to animals, the City shall make every reasonable effort to meet the needs of all individuals.

Use of Support Person

The City is committed to welcoming visiting persons with disabilities who are accompanied by a support person. If a visiting 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 visiting 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 others on the premises.

If an amount is payable by a support person for admission to the premises or in connection with a support 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 by including same on the City's website and in any other manner deemed appropriate.



In situations where the City has obligations under privacy laws or has issues of confidentiality or professional obligations, a support person may be requested to agree to requirements of service just as the person with a disability does.

Assistive Devices

The City is committed to welcoming visiting persons with disabilities who carry their own assistive device for the purpose of obtaining, using and benefitting from the City's goods, services or facilities. It is the responsibility of the person with a disability to ensure their assistive device is operated in a safe and controlled manner at all times.

In the situation where the City has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises the City may offer a person with a disability other reasonable measure of assistance in obtaining, using and benefiting from the City's goods, services or facilities, where the City has such other measures available.

Notice of Temporary Disruption

The City is committed to establishing, implementing, and maintaining a process to provide notice of service disruptions. If, in order to obtain, use, or benefit from the City's 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 the following information:

- the reason for the disruption
- the anticipated duration
- a description of what alternative facilities or services are available, if any.

Notice shall be given on the approved Notice of Disruption Form by posting the information at a conspicuous place at the location of the disruption which may include any or all entrances and by posting it on the City's website or by such other method as is reasonable in the circumstances.

Customer Service Training

The City is committed to establishing, implementing, and maintaining a program for training staff on how to provide customer service to persons with disabilities.

The City shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities:

- Every person who deals with members of the public or other third parties on behalf of the City, whether the person does so as an employee, agent, volunteer or otherwise.
- Every person who participates in developing the City's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties.
- The training must include a review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of this Regulation and instruction about the following matters:



- How to interact and communicate with persons with various types of disability.
- 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.
- How to use equipment or devices available on the City's premises or otherwise provided by the City, where the person interacts with the public, which may help with the provision of goods or services to a person with a disability.
- What to do if a person with a particular type of disability is having difficulty accessing the City's goods or services.
- The City's customer service policies, practices and procedures governing the provision of goods or services to persons with disabilities.

The training shall be provided to each person as soon as practicable after they have been assigned the applicable duties. The training shall 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.

Records of training shall be kept by the City of who was trained, when they were trained, and in which format the training was delivered.

Feedback Process

The City is committed to establishing, implementing, and maintaining a process for receiving and responding to feedback about how to provide goods or services to persons with disabilities. The City has established a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and shall make information about the process readily available to the public.

Employees, members of public or others can provide feedback in person, by telephone, in writing, or by delivering an electronic text by email or online, or otherwise.

The feedback process shall include the following:

- The opportunity for the public to provide feedback in person, by telephone, in writing, or by delivering an electronic text by email or online, or otherwise.
- The opportunity to provide as much information as possible when providing feedback so that
 the event can be readily identified by the Supervisor and/or Manager responsible for where
 the event took place. This information may include dates, times, names, contact information,
 a description of the event, etc.
- Feedback may be received by any person who deals with members of the public or other third parties on behalf of the City, whether the person does so as an employee, agent, volunteer or otherwise and any person who participates in developing the City's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. A copy of the feedback shall be forwarded to the responsible Supervisor and to the Manager for review and to the Clerk's office for reporting purposes.
- An answer to the feedback is not mandatory, however, depending on the situation, the Supervisor and/or Manager responsible for where the event took place may deem it appropriate to respond to the individual. Should an answer be deemed appropriate and should the individual have chosen to supply their contact information, the individual may expect a response within 15 business days.



Policy Review

This policy shall be reviewed and updated by the Office of City Clerk to meet compliance with changes in legislation or whenever there are changes to the City's practices or procedures.

Questions about this policy

This policy exists to achieve service excellence to people with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by or referred to the City Clerk.

Contraventions

A suitable action will be taken against employees, officials, and others responsible for compliance with the requirements of Accessibility for Ontarians with Disabilities Act (AODA) including a disciplinary action, up to and including dismissal. The City's failure to comply with AODA may result in significant fines and reputational damage.

Reference and Related Policies and Documents

- Municipal Accessibility Advisory Committee Terms of Reference
- AODA Training
- Accessibility Plan
- Employee Accommodation Policy
- Election Accessibility Plan

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Matthew Stephenson Interim General Manager, Human Services
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Mathieu Fleury Chief Administrative Officer