

# **UPPER THAMES RIVER CONSERVATION AUTHORITY**

## **AODA Integrated Accessibility Standards Policy and Plan**

**APPROVED: DECEMBER 10, 2013**

## **AODA Integrated Accessibility Standards Policy and Plan**

### ***Purpose***

The Integrated Accessibility Standards (Regulation 191/11) (IASR) under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) came into force on July 1, 2011. The regulation establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment, and transportation. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario Human Rights Code.

The purpose of this policy and work plan is to ensure that the Upper Thames River Conservation Authority (UTRCA) complies with the Government of Ontario's integrated accessibility standards.

### ***Application and Scope***

This policy applies to UTRCA employees, Board members and volunteers.

### ***Policy Statement***

The UTRCA is committed to creating an inclusive culture across the organization by preventing and removing barriers for persons with disabilities. Where it is not possible to remove barriers, the UTRCA will make efforts to accommodate persons with disabilities in a timely, effective and suitable manner.

The UTRCA supports the principles of the AODA and the Integrated Accessibility Standards Regulation.

### ***Definitions***

**Barrier:** anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier,

an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

**Standard:** according to the AODA, sets out what a person or organization must do to achieve accessibility for persons with disabilities to whom the standard applies.

**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.

**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.

**Feedback:** any comments, compliments, suggestions or complaints provided to UTRCA by its customers.

**Disability:** according to the Ontario Human Rights Code, as referenced by AODA, means:

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

(Disabilities may differ in severity, may be visible, invisible, and have effects which may come and go).

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

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

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

**Kiosk:** means an interactive electronic terminal, including a point of sale device, intended for public use.

## ***Requirements***

### **1. Confidentiality of Information**

Personal information concerning an individual's disability cannot be released without written consent of the individual and must be managed in a manner that is consistent with the Municipal Freedom of Information and Protection of Personal Privacy regulations, where appropriate. Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party, and any person or department delegated by that third party, will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required.

### **2. Accessibility Plan and Policies**

Through this AODA Integrated Accessibility Standards Plan and Policy and related accessibility policies, the UTRCA confirms our commitment to meet the needs of persons with disabilities in a timely manner.

The UTRCA will make these documents publicly available and provide them in an accessible format upon request.

- 2.1. The UTRCA will review and update this multi-year accessibility plan and policy once every five years.
- 2.2. The UTRCA will post the Plan and Policy on its website and provide it in accessible format upon request.
- 2.3. When required, The UTRCA will submit status reports on the progress of measures taken to implement its strategy, post the report on its website and provide it in accessible format upon request.

### **3. Procuring or acquiring goods, services or facilities**

The UTRCA will incorporate accessibility features and criteria when procuring or acquiring goods, services or facilities, except where not practicable to do so. Where it is deemed not practicable to do so, the UTRCA will provide an explanation upon request.

**Current Status:** We are currently in the midst of adopting this practice.

**Plans to Improve:** Add a statement to our tender document asking for contractors to explain how their product or service meets the AODA standards. This task will be completed as soon as possible. Develop a way to document that we did take AODA into account and how we complied with the Act.

### **4. Self-service kiosks**

The UTRCA will incorporate accessibility features when designing, procuring or acquiring self-service kiosks, except where not practicable to do so.

**Current Status:** *Our only current self-service kiosks are point of sale devices.*

**Plans to Improve:** *Review accessibility of POS devices and improve where feasible.*

## **5. Training**

The UTRCA will provide training to employees and Board members on the requirements of accessibility standards and on the Ontario Human Rights Code as it pertains to persons with disabilities.

**Current Status:** All members and staff have been trained on the AODA Customer Service Standard but not on the IASR.

**Plan to Improve:** All staff will complete web based IASR training by December 31, 2014. This will be achieved by providing staff with an instruction sheet outlining the IASR training requirements and links to IASR training videos supplied by AccessForward and the Ontario Human Rights Commission. Staff will also be required to read UTRCA's IASR Policy Plan. Once staff have completed the IASR training, they will be required to sign the instruction sheet and submit it to Human Resources as proof of training.

## **6. Information and Communications**

### **6.1. Feedback**

The UTRCA will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities and will notify the public about the availability of accessible formats and communications supports.

**Current Status:** Feedback can be received or responded to in several formats, including telephone, in person, written, fax, electronic. UTRCA websites list various means of communicating.

**Plans to Improve:** Continue with this practice.

## **6.2. Accessible formats and communication supports**

- i. The UTRCA shall provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs.
- ii. The UTRCA will consult with the person making the request to determine the suitability of an accessible format or communication support.
- iii. Communication supports will be provided at a cost that is no more than the regular cost charged to other persons.

**Current Status:** Staff is limited in ability to provide accessible Word and pdf documents.

**Plans to Improve:** Undertake staff training for accessible documents (Word, PDF, etc.), so that accessible formats can be provided when requested.

## **6.3. Accessible websites and web content**

The UTRCA will make its Internet websites and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at level A and increasing to level AA, except where not practicable to do so.

**Current Status:** Current website does not easily permit conformity with WCAG 2.0.

**Plans to Improve:** Currently redesigning website with different program that will permit conformity with WCAG 2.0. Many documents and reports that are posted in future will be accessible (undertake staff training first). Provide alternative tags, etc. for non-text features. Work towards navigation that is keyboard accessible.

## **7. Employment**

### **7.1. Recruitment**

The UTRCA 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 UTRCA 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 UTRCA's policies for accommodating employees with disabilities as part of their offer of employment.

**Current Status:** AODA Information is posted on all job postings effective September 1, 2013. When interviews are set up individuals are offered accommodations effective 2010.

**Plans to Improve:** Continue with this practice

### **7.2. Employee Supports**

The UTRCA 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 UTRCA will provide this information to new employees as soon as practicable after they begin their employment and 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.(see policy)

**Current Status:** Policy statement can be found on page one of this document. Also, the UTRCA Return to Work policy is posted on the HR website for all new staff to review.

### **7.3. Accessible Formats and Communication Supports for Employee**

Upon an employee's request, the UTRCA shall 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; and
- information that is generally available to employees in the workplace.

The UTRCA will consult with the employee making the request in determining the suitability of an accessible format or communication support. See Accessible Formats and Communications Supports Procedure (6.2).

### **7.4. Workplace Emergency Response Information**

If an employee's disability is such that workplace emergency response information is necessary and the UTRCA 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 UTRCA reviews its general emergency response plan.

**Current Status:** Email was sent to all staff on October 2, 2012 asking if staff needed accommodation for workplace emergencies, they were to contact Sharon Viglianti.

**Plans to Improve:** Information will be communicated to all new staff on their job offer letter.

## **7.5. Documented Individual Accommodation Plans**

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. The written process shall include:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The manner in which the UTRCA may request an evaluation by an outside medical or other expert, at the UTRCA's expense, to assist with determining if and how accommodation can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- The means of providing the accommodation plan in a format that takes into account the employee's accessibility needs.

If requested, these plans shall include information regarding accessible formats and communications supports. If requested, the plans shall include individualized workplace emergency response information.

**Current Status:** Process is included in the UTRCA's Return to Work Program

**Plans to Improve:** RTW Program has been updated to include information regarding accessible formats, communication supports and emergency response information

## **7.6. Return to Work Process**

The UTRCA shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process shall outline the steps that the UTRCA shall take to facilitate the return to work.

**Current Status:** Return to Work Program in place since 2001

**Plans to Improve:** Required information related to AODA has been added to the RTW Program

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

The UTRCA 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.

**Current Status:** Performance Management system in place

**Plans to Improve:** Review and update wording

### **8.0 Design of Public Spaces**

The UTRCA will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces such as recreational trails, picnic areas, outdoor playgrounds, sidewalks, ramps, stairs, curb ramps, and service counters.

**Current Status:** The Watershed Conservation Center was built in 2012 and currently meets these standards.

Conservation Areas & Recreational Properties:

Barrier	Strategies for Removal or Prevention
Registration Offices	Evaluate to determine accessibility; make improvements as feasible. Provide exceptional

	customer service to persons who may not be able to access the registration office
Washrooms	Post universal signage to direct people to accessible washrooms and stalls. Where feasible, make improvements to existing washroom facilities to make them accessible or build accessible washroom facilities in locations that currently do not have any.
Picnic areas	Conduct a review of the barriers at picnic areas, playgrounds and shelters. Improve accessibility as needed.
Parking	Create accessible parking spots. Post universal signage.
Campsites	Investigate the possibility of accessible campsites, identify current barriers and develop accessible campsites where feasible.
Trails	Where feasible, work towards improved trail accessibility.

## 9.0 Notice of temporary disruption

The UTRCA will notify persons with disabilities promptly in the event of a planned or unexpected disruption to services or facilities. This notice will be provided in accessible formats and posted in public areas.