



Integrated Accessibility Policy and Plan

Accessibility for Ontarians with Disabilities Act
(AODA)

Approved February 17, 2022

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1. Purpose

Regulation 191/11: Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005* requires organizations to create written accessibility policies and make them publicly available. Accessibility policies are the formal rules an organization puts in place to achieve its accessibility goals.

2. Statement of Organizational Commitment

The Ausable Bayfield Conservation Authority (ABCA) is committed to ensuring equal access and participation for people with disabilities and treating people with disabilities in a way that allows them to maintain their dignity and independence. The ABCA believes in integration and is committed to meeting the needs of people with disabilities in a timely manner. This will be done by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and Ontario's accessibility laws.

3. Policy Statement

The ABCA Integrated Accessible Policy (hereafter referred to as the "Policy" establishes a framework for compliance with the commitment to accessibility, requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), requirements of the Integrated Accessibility Standards Regulation (IASR) under the AODA, and additional conservation authority requirements.

The ABCA is committed to building an inclusive society that values the contributions of people with disabilities. It is committed to providing an accessible environment in which people with disabilities can access the ABCA's goods, services, and facilities, including buildings, public spaces, information and communications, in a way that meets their individual needs. The ABCA is committed to the identification, removal and prevention of accessibility barriers, including attitudinal, systemic, information, communications and technology, and built environment and physical barriers.

The ABCA is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. The ABCA understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

The ABCA is committed to excellence in serving and providing goods, services or facilities to customers including people with disabilities. Accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

The AODA provides for the development, implementation and enforcement of accessibility standards in order to achieve accessibility for persons with disabilities in all aspects of society. The ABCA must meet requirements in key areas including:

- General Standards (Procurement, Training and Policy)
- Customer Service
- Information and Communication
- Employment
- Transportation
- Built Environment and Public Spaces.

In the key areas listed above, the AODA requires the ABCA to:

- identify, prevent and remove barriers people with disabilities face in accessing the ABCA's goods, services, and facilities
- accommodate the accessibility needs of people with disabilities to ensure they can obtain, use or benefit from ABCA goods, services, and facilities, and that they can do so in a timely manner, at a cost no greater than the cost for people without disabilities
- develop and train ABCA employees on providing accessible goods, services, and facilities.

4. Scope

This policy applies to persons who deal with members of the public or other third parties on behalf of the ABCA, whether the person does so as an employee, director, agent, volunteer, student placement, or otherwise and persons who participate in developing the ABCA's policies governing the provision of goods, services or facilities to members of the public or other third parties.

5. Definitions

Accessibility means a concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and also refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.

Accessible refers to products, devices, information, services, facilities or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility

related disabilities. The concept of accessible design ensures both “direct access” (i.e. unassisted) and “indirect access,” referring to compatibility with a person’s assistive technology.

Accessible Formats refers to formats usable by persons with disabilities including but not limited to: large print, recorded audio and electronic formats, and Braille.

Accommodation means in the context of Human Rights. Accommodation means preventing and removing barriers caused by attitudinal, systemic, physical, information or communications, and technology barriers that unfairly exclude individuals or groups protected by Ontario’s Human Rights Code from having equal access to full benefits available to others. Principles of accommodation include dignity, individualization and inclusion or integration.

Assistive Devices are used to replace, compensate or improve the functional abilities of people with disabilities. They include a broad range of items including mobility such as: prosthetics, wheelchairs, canes, walkers, medical such as ventilators, respiratory equipment and sensory such as communication aids, reading and writing devices and hearing aids.

Barrier is defined by the AODA as 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.

Disability: as defined in Section 10 of the Ontario Human Rights Code, R.S.O. 1990 c. H.19.

- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limited the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, 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 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*.

ABCA means the Ausable Bayfield Conservation Authority.

Practicable means capable of being done or put into practice; capable of being used. Factors relevant to determining if accessibility is practicable may include:

- Availability of accessible services, goods including commercial software or tools, or facilities;
- Technological compatibility between older products and newer ones being procured.

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 a regulated health professional confirming that the person requires the animal for reasons relating to the disability.

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.

6. General Standards

The ABCA is committed to meeting the accessibility needs of people with disabilities.

Accessibility Policies

The ABCA will ensure the general requirements of the Integrated Accessibility Standards Regulation (IASR) under the AODA are met in order to achieve accessibility for persons with disabilities. The AODA requires the ABCA to maintain one or more policies governing how the organization will achieve the requirements of the IASR. The ABCA will also make such documents available to the public, and in accessible formats upon request. This Policy is adopted in compliance with this obligation.

Multi-Year Accessibility Plan

The ABCA will establish, implement, maintain and make public a Multi-Year Accessibility Plan outlining the corporate strategy to identify, remove and prevent barriers and to meet the legislated requirements of the IASR.

The Plan is posted on the ABCA website and made available in an accessible format or with appropriate communication supports as soon as possible, upon request.

Procurement of Goods, Services and Facilities

As required by the AODA, when acquiring or procuring goods, services, and facilities,

including self-service kiosks the ABCA must incorporate accessibility criteria and features, and will do so as early as possible in the procurement process. Where it is not practicable to do so, an explanation will be provided upon request, in accordance with Ausable Bayfield Conservation Authority Personnel Regulation #24: Purchasing and Quotation Procedures.

Self-Serve Kiosks

The ABCA will incorporate accessibility features/consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

Training

The AODA requires that employees, volunteers and persons who participate in developing ABCA policies must receive training on the AODA, the *Ontario Human Rights Code*, and Accessible Customer Service.

The ABCA is committed to training staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, training will be done for people who develop the organization's policies; and who provide goods, services or facilities on behalf of the organization.

People will be trained as soon as practicable after being hired and provide training in respect of any changes to the policies. The ABCA maintains records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Feedback

The ABCA welcomes feedback on how ABCA provides accessible customer service. Customer feedback helps us identify barriers, respond to concerns and encourage continuous service improvement.

Responding to Feedback:

Feedback on accessible customer service, regardless of how it is received, should be directed initially to the Corporate Services Coordinator (CSC) or designate for the feedback to be reviewed and identified as a complaint, suggestion or compliment. The CSC or designate will advise the person who submitted the feedback of the decision and reasons for it, within 30 business days. If agreement on the resolution of a concern cannot be reached between the appropriate department manager, the complainant has the option of presenting the concern

to the ABCA Board of Directors for final disposition.

Feedback can be provided to the ABCA by mail, phone, in person, email or through the website.

The Feedback form is part of the ABCA's Accessibility Standards for Customer Service and is available on the ABCA website. The ABCA ensures the feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Notice of Availability of Documents

The ABCA notifies the public that documents related to accessible customer service are available upon request on the ABCA website: www.abca.ca. The ABCA will provide these documents in an accessible format or with communication support, on request. The ABCA will consult with the person making the request to determine the suitability of the format or communication support and will provide the accessible format in a timely manner and, at no additional cost.

7. Customer Service Standard

Assistive Devices

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from the ABCA's goods, services or facilities. It is the responsibility of the person with a disability to ensure his/her assistive device is operated in a safe and controlled manner.

Exceptions may occur in situations where the ABCA has determined 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. In these situations, and others, the ABCA may offer a person with a disability other reasonable measures of assistance in obtaining, using and benefiting from the ABCA's goods, services or facilities, where the ABCA has such other measures available. Staff within the applicable department will be trained in the application and use of the devices the ABCA has on site or will provide that may be used by customers with disabilities while accessing our goods, services or facilities.

Notice of Temporary Disruption

Temporary disruptions in ABCA services or facilities may occur due to reasons that may or may not be within the ABCA's control or knowledge.

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the ABCA will make reasonable efforts to provide notice of

the disruption to the public including information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if any, may be available.

Services/Facilities include any temporary planned or unplanned service disruption of facilities, services or systems that are relied upon by people with disabilities to access ABCA goods, services or facilities, such as elevators, lifts, or accessible washrooms.

If the disruption is anticipated, the ABCA will provide a reasonable amount of advance notice of the disruption. The ABCA will provide notice by any method that may be reasonable under the circumstances, as soon as possible, including but not limited to the ABCA website or site-specific postings.

Support Persons

Persons with disabilities may enter premises owned or operated by the ABCA with a support person and have access to the support person while on the premises. The ABCA may require a person with a disability be accompanied by a support person while on conservation authority premises in situations where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Before making a decision, the ABCA will:

- consult with the person with a disability to understand their needs;
- consider health or safety reasons based on available evidence; and
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

A support person, when assisting a person with a disability to obtain, use or benefit from the ABCA's goods, services or facilities, will be permitted to attend at no charge where an admission fee is applicable.

The ABCA will confirm that if an amount is payable for a person's admission to the premises and ensure that notice is given in advance about the amount, if any, payable in respect to the support person.

Service Animals

The ABCA welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. When a service animal cannot be easily identified, staff may ask for a letter from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

If service animals are prohibited by another law, ABCA will attempt to provide people with disabilities access to goods, services or facilities. The reason the animal is excluded will be explained and another way of providing goods, services or facilities will be discussed.

It is the responsibility of the person with the disability to be in care and control of the service animal, at all times. If the service animal is not kept under control, has bitten another person or animal, or is a menace to the safety of other persons or animals, the service animal may be required to leave the premises. If this occurs the person will be permitted to continue to access the goods or services without the animal. In addition, ABCA employees will, upon request, consider alternate accommodations for the person in such circumstances. The ABCA may refuse to permit the service animal to accompany the person until steps have been taken to correct the situation, and the issue has been resolved.

8. Information and Communication Standards

The ABCA communicates with people with disabilities in ways that take into account their disability and works with the person with disabilities to determine what method of communication works for them.

Accessible Formats and Communication Supports

The ABCA will create print, online and presentation materials to meet accessible format standards with respect to font family, font size, formatting, contrast and colours. The Microsoft 'Check Accessibility' or other available tool will be used to review documents before published or distributed.

Upon request, the ABCA will provide or arrange for the provision of accessible formats or communication supports for 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 ABCA communicates with people with disabilities in ways that take into account their disability. When asked, information about our organization and its services, including public safety information, in accessible formats or with communication supports will be provided.

The ABCA 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 Corporate Services Department, the information or communication is determined to be unconvertible, the ABCA 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.

The ABCA will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements, as practicable, in accordance with Ontario's accessibility laws.

Emergency Procedures, Plans or Public Safety Information

The ABCA will, upon request, provide emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports as soon as practicable.

Accessible Websites and Web Content

The ABCA will ensure the official website and web content conforms, as practicable, to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG). Except where meeting this requirement is not practicable, this conformity applies to websites, web content and web-based applications that are controlled directly or through a contractual relationship that allows for the modification of the product and to web content.

The ABCA Corporate Services Department is responsible for establishing and maintaining procedures, standards and guidelines to ensure Internet websites and web content are accessible.

9. Employment Standards

The ABCA 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 Conservation Authority. Volunteers and other non-paid individuals are not captured under this section. This section addresses the ABCA's requirements of the IASR Employment Standards under the AODA.

Recruitment, Assessment and Selection Process

The ABCA is committed to equal consideration of candidates during the recruitment, assessment and selection process. Job applicants, including the public and current employees, will be notified of the availability of accommodations for persons with disabilities in its application process.

Individuals selected to participate in an interview or testing, will be notified of the availability of accommodations, upon request, during such an assessment or selection process. In cases where accommodations due to disability are requested, the ABCA will consult with the individual and provide or arrange for suitable accommodations in a manner that takes into account the applicant's disability needs. Accommodations will be provided with respect to the materials or processes used in recruitment. When making offers of employment, the ABCA will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

The ABCA notifies staff that supports are available for those with disabilities as soon as practicable after they begin their employment. Updates are provided when necessary.

Accessible Formats and Communication Supports for Employees

The ABCA will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability with regards to information needed to perform the employee's job; and information generally available to employees in the workplace

Workplace Emergency Response Information

The ABCA will provide individualized emergency response information to employees who identify potential accessibility barriers when responding to emergency situations. If the employee requires assistance and with their consent, the ABCA will provide the individualized emergency response information to the person(s) designated to provide assistance. The ABCA will provide the information as soon as practicable after the need is expressed.

The ABCA will review the individualized workplace emergency response information:

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

Documented Individual Accommodation Plans

A written process for the development of documented individual accommodation plans for employees with disabilities. The individual accommodation plan shall include:

- If requested, any information regarding accessible formats and communication supports provided to the employee;
- If required, individualized workplace emergency response information; and
- Any other accommodations that are to be provided

Return to Work Process

The ABCA maintains a documented return-to-work process for employees with a disability and who require disability-related accommodation in order to return to work. The return to work process outlines the steps the ABCA will take to facilitate the return to work and will include documented individual accommodation plans 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.

Performance Management, Career Development, and Redeployment

The ABCA will ensure employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management and redeployment opportunities.

10. AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

The ABCA will ensure accessibility at its facilities and public spaces by designing with accessibility in mind.

The ABCA 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.

11. Transportation Standards

The South Huron Trail Mobile, a four-passenger electric “golf” cart, is used to transport people with limited mobility along the South Huron Trail. The volunteer drivers are trained on best practices of accommodating people with disabilities.

12. AODA Reporting Requirements

The ABCA will submit completed compliance reports to the Province in accordance with the schedule set out in the AODA.

13. Financial Implications

The ABCA may incur costs in implementing staff training required for meeting the accessibility standards for customer service. There may also be costs for providing services and assistive devices. The other potential financial implication is in regard to non-compliance with the law. Enforcement provisions exist under the AODA that did not exist previously under the ODA.

14. Changes to This or Other Policies

The ABCA is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Any changes made to this policy will take into consideration the impact on people with disabilities. This document is publicly available. Accessible formats are available upon request.

15. Questions About This policy

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, an explanation should be provided by or referred to the Corporate Services Coordinator.

16. Contraventions

Failure to comply with this policy may result in disciplinary action, up to and including dismissal.