



Township of East Zorra-Tavistock

Human Resources Manual

Title: Integrated Accessibility Standards Regulation (IASR) Policy	
Section: Accessibility	Number: 2.28
Version: 1.12	Review Frequency: Every 5 years
Approved by: Council	Approval Date: 2023-10-04
Application: All Employees, Council, volunteers and service providers.	
Notes:	

POLICY STATEMENT

The Township of East Zorra-Tavistock is committed to providing equal treatment to people with disabilities with respect to the use and benefit of Township 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

The purpose of this policy is to outline the requirements established under the Integrated Accessibility Standards, Ontario Regulation 191/11 of the Accessibility for Ontarians with Disabilities Act, 2005, as they relate to the General Requirements, Information and Communications, Employment, Transportation and Design of Public Spaces, to demonstrate how the Township will undertake to comply with these requirements.

APPLICATION

1. GENERAL REQUIREMENTS:

a. Establishment of Policies, Procedures and Best Practices

The Township shall develop, implement and maintain policies governing how it achieves, or will achieve accessibility through meeting the requirements referred to in the Regulation. Specifically, all policies shall include a corporate commitment for meeting the accessibility needs of persons with disabilities in a timely manner.

To fulfil the requirements set out in the policy, standard operating procedures/processes will be developed or amended accordingly.

These documents, where appropriate, will be made available to the public and provided in an accessible format upon request.

b. Accessibility Plan

The Township shall develop and implement a multi-year accessibility plan outlining the corporate strategy for identifying, removing and preventing barriers, and meeting the requirements set out in the Regulation.

The plan will be reviewed at least once every five years, will be posted on the Township's website and will be provided in an accessible format, upon request.

c. Procurement or acquiring goods, services or facilities

When procuring or acquiring goods, services or facilities, the Township shall incorporate accessibility guidelines or standards into relevant policies, procedures and by-laws.

d. Self Service Kiosks

The Township does not provide any services using self-service kiosks at this time. The Township shall incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

e. Training - Requirements of this Standard & Ontario Human Rights Code

The Township shall ensure that training is provided on the requirements of the Integrated Accessibility Standard and on Human Rights Code. See **Appendix 'A'** of this Policy for a copy of the IASR/ Human Rights Code Training Manual.

Training will be provided on an ongoing basis whenever there are changes made to the policies, practices and procedures.

The IASR and Human Rights Code training shall be appropriate to the duties of the employees, volunteers and other persons.

2. INFORMATION AND COMMUNICATION REQUIREMENTS:**a. Feedback**

The Township shall ensure that its process for receiving and addressing feedback is accessible for persons with disabilities by providing, or arranging for the provision of any document related to this service in an accessible format and communication supports upon request. The Township shall consult with the person making the request in determining the suitability of an accessible format or communication support. This shall be done in a timely fashion and the Township shall not charge a cost that is more than the regular cost charged to other persons.

b. Accessible Formats and Communication Supports

The Township shall, upon request, provide or arrange for the provision of its documents, where appropriate, in an accessible format or communication support in a timely manner. When providing accessible formats, the Township shall take into account the person's disability and individual communication needs by consulting the person directly.

The Township shall notify the public about the availability of accessible formats and communication supports through its website. The Township shall not charge a cost that is more than the regular cost charged to other persons.

c. Emergency Procedure, Plans or Public Safety Information

The Township shall provide emergency procedures, plans or public safety information that are available to the public in an accessible format upon request.

The Township shall notify the public about the availability of this information being available in an accessible format through its website.

d. Accessible Websites and Web Content

The Township will make its website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA.

3. EMPLOYMENT STANDARDS**a. Recruitment (General, Selection Process)**

The Township shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. This notification shall be included at the following stages of the recruitment process:

- Employment postings
- Selection process
- When an offer of employment is made

If an accommodation request is received, the Township will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

b. Informing Employees of Supports

The Township shall inform its employees of its policies and procedures used to support 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 a disability.

c. Accessible Formats and Communication Supports for Employees

Upon request, the Township shall work with the employee with a disability when providing or arranging for the provision of accessible formats or 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.

d. Workplace Emergency Response Information

The Township shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that individualized information is necessary and the Township is aware of the need for accommodation due to the employee's disability.

The Township shall advise existing employees of this section of O. Reg. 191/11 and shall provide information on this matter for new employees.

e. Individualized Accommodations Plans

Upon request, the Township shall work with employees with disabilities to establish an individualized accommodation plan.

f. Return to Work Process

The Township shall work with employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

g. Performance Management

The Township shall take into consideration the accessibility needs of employees with disabilities, as well as individualized accommodations plan(s) when using its performance management process in respect of employees with disabilities.

Performance management refers to the activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

h. Career Development and Advancement

When providing career development and advancement opportunities, the Township shall take into consideration the accessibility needs of its employees with disabilities as well as any individual accommodation plan(s).

Career development and advancement includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization and is usually based on merit.

i. Redeployment

The Township shall take into consideration the accessibility needs of its employees with disabilities as well as individual accommodation plan(s) when redeploying employees with disabilities.

Redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

4. TRANSPORTATION

At this time, the Transportation Standard component of the Integrated Accessibility Standards does not apply to the Township.

5. DESIGN OF PUBLIC SPACES

The Township shall meet accessibility requirements when constructing and maintaining new or redeveloped elements of public spaces including:

- Recreational trails and beach access routes
- Outdoor eating areas for public use
- Outdoor play spaces (such as playgrounds)
- Exterior paths of travel (such as walkways across parks or between buildings)
- Accessible on and off street parking
- Service counters and waiting areas

When undertaking new construction or redevelopment in any of the above categories, the Township shall refer to and comply with the legislative requirements for that category. Depending on the project, consultation with the public may be required.

As per the legislation, the Township is not required to make changes to existing public spaces. The standard only applies when organizations build new or make major changes to existing elements of public spaces.

Appendix “A”



Township of East Zorra-Tavistock

Integrated Accessibility Standards
Regulation (Ontario Reg. 191/11)

Ontario Human Rights Code (OHRC)

Training Manual



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Part 1: Background to Accessibility Legislation

Approximately 1.85 million people in Ontario have a disability (approximately 15.5% of Ontario's population).

As the population ages, it is expected that the number of residents with disabilities will increase.

In 2005, the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA).

“Accessibility Standards” have since been created under the AODA:

- Customer Service Standard
- Integrated Accessibility Standards Regulation (IASR)

Province's goal is to make Ontario accessible by 2025, through creation and enforcement of these Accessibility Standards.

Part 2: IASR General Requirements

The Regulation applies to all organizations with at least one employee, and that provide goods, services, or facilities.

Training on the Regulation must be provided to every employee, volunteer or anyone else participating in the provision of goods/ services/ facilities on behalf of the organization – must keep a record of training.

Must have written policies under the Regulation that are available, upon request, in an accessible format.

Must establish and maintain a “Multi-Year Accessibility Plan”.

Must incorporate accessibility design, criteria, and features into procurement (except where it is not practicable to do so) – where not practicable, must provide an explanation as to why not.

If applicable, must incorporate accessibility features into designing/ procuring self-service kiosks.

Part 3: Information/ Communications Standard

When requested, must provide info in an accessible format, in a timely manner

Exceptions: product labels; info that you do not control directly/ indirectly; info that simply cannot be converted
When not possible, must provide an explanation why, as well as a summary of the info itself

Feedback Process – if your organization has one in place, must ensure it is accessible (both for providing AND receiving feedback)

Emergency procedures, plans and public safety information must be provided in an accessible format, upon request

NOTE: real time emergency info is not included in this requirement

Organization websites must comply to international Web Content Accessibility Guidelines (WCAG) 2.0 Level 'AA' (advanced)

Information/Communication Standard also applicable to:

- Public Libraries
 - o When requested, public libraries are to provide access to accessible library materials, where they exist
- Educational and Training Institutions:
- Producers of Educational or Training Material

Part 4: Employment Standard

Employers must inform all employees of accessible employment policies and practices (ie) employee accommodation.

Accessible Recruitment Process:

- Must state that accommodations are available throughout the recruitment process (ie in job ad, for those attending an interview etc.)
- Must advise successful applicant of accommodation policies

Accessible Formats/ Communication Supports:

- Once hired, Employee may request accessible formats, to which Employer must consult with Employee to determine how to best accommodate Employee
- (ie) Screen reader? Electronic Format?? Text Transcripts???

Must have formal process in place for documenting “Individual Accommodation Plans”, for Employees with disabilities

Workplace Emergency Response Plans:

- Must have Plan where Employee’s disability makes it necessary, or the Employer is aware of the Employee’s need
- Policy 2.24 in EZT HR Policy Manual speaks to this matter

Performance Management, Career Development and Redeployment must take into account the accessibility needs of employees contained within their accommodation plans

Return to Work Process:

- Must outline the steps that will be taken to facilitate the Employee's to return to work
- Would be quite similar to the provisions in Policy 12.1 (Early and Safe Return to Work) in the EZT Corporate Health and Safety Policy

Part 5: Transportation Standard

The Transportation Standard sets out the requirements to prevent and remove barriers to public transportation, so that everyone can travel more easily in Ontario. It covers:

- Conventional transportation services such as:
 - o Municipal transit buses
 - o Motor coaches – Not Greyhound (Federal)
 - o Rail based transportation (e.g., subways, commuter trains, GO Train etc.) – Not VIA Rail (Federal)

- Specialized transportation services for people with disabilities

- Taxicabs, where a municipality has chosen to license such operations.

The Township is not currently directly involved in the delivery of transportation services and therefore, the Transportation Standard is not applicable. The Township will review the Standard again, should service provisions change in the future.

Part 6: Design of Public Spaces

Accessible public spaces make it easier for people with disabilities to move through and use the environment.

The requirements apply when building new or making planned significant alterations to existing public spaces on and after January 1, 2016, and are divided into seven sections:

- 1) Recreational Trails and Beach Access Routes;
- 2) Outdoor Public-Use Eating Areas, like those found at rest stops or picnic grounds;
- 3) Outdoor Play Spaces;
- 4) Exterior Paths of Travel (walkways) and their associated elements, such as ramps, stairs, curb ramps, rest areas and accessible pedestrian signals;
- 5) Accessible off-street, and on-street, Parking Spaces;
- 6) Obtaining Services (service counters, fixed queuing guides and waiting areas);
- 7) Maintenance Planning.

Key considerations behind many of the items in the Design of Public Spaces include:

- Consultation with public/people with disabilities;
- Consideration for both people with disabilities and caregivers;
- Height/ width, slope and surface material used for construction;
- Signage;
- Procedures for maintenance following construction.

Part 7: Ontario Human Rights Code

The IASR (under AODA) requires training about the Ontario Human Rights Code (Code).

The Code offers protection of rights, equal opportunity, and freedom from discrimination. It applies to jobs, housing, and services.

The Code states that employers, landlords, and service providers must accommodate people with disabilities to the point of undue hardship.

The Code and the AODA work together in various ways to promote equality and accessibility.

The Code has primacy. It overrides the AODA and other provincial laws when there is a conflict. In fact, the AODA states that law offering the higher level of accessibility comes first.

In the Code, disabilities can include physical limitations, mental health, cognitive or intellectual development, learning, hearing, or vision. They also can include epilepsy, substance addictions, environmental sensitivities, and workplace injuries.

The Code protects people from discrimination and harassment because of past, present, or perceived disabilities.

Employers must accommodate employees when they cannot perform all of the duties of the job because of their disabilities, up to the point of undue hardship.

If the accommodation was not made, and would not have caused undue hardship, a claim of discrimination can be made to the Human Rights Tribunal of Ontario.

The Code is not meant to punish. When discrimination happens, the goal is to fix the situation to provide equal opportunity for the person with a disability.

Applying Human Rights principles in the workplace:

- **Don't create new barriers:** don't make changes to facilities, services, goods, technology, or procedures that reinforce or create new barriers.
- **Design inclusively:** Make choices that work for as many people as possible, especially those with disabilities, while meeting individual needs.
- **Favour integration over segregation:** Usually the best accommodations allow people with disabilities to participate in similar ways with everyone else.
- **Equal outcomes sometimes require different treatment:** Different or separate accommodations may be necessary to help people do their jobs or access services.
- **Involve those who need accommodations in exploring solutions:** They often know what works best for them. Make sure the process and solutions meet the individuals' needs and promote privacy, dignity, and respect.
- **Spread out accessibility costs:** People with disabilities should not face extra costs for accommodations they need to do their job or receive a service. Accessibility should be factored in as part of the overall cost of doing business.

Mandatory Training Registration

Thank you for taking the time to review this important information, which will help you better understand the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code (OHRC).

Please complete and submit the registration card attached via delivery to the Township Office. If your training involved additional information beyond this booklet, your trainer and/or Manager/Supervisor may record your training in an alternate manner.

IASR and OHRC Training is mandatory for Council, employees, contractors and volunteers. The CAO's Office will track training and will follow-up for registration cards not received.

Training Notes



Deliver to:

Township of East Zorra-Tavistock

90 Loveys Street, Box 100

Hickson ON N0J 1L0

Attention: Accessibility for Ontarians with Disabilities Act IASR/
OHRC Training Records

Name:

Department:

Date:

Signature:

By signing above and submitting this registration card, I hereby confirm my acceptance of the booklet titled “Integrated Accessibility Standards Regulation (191/11) / Ontario Human Rights Code (OHRC) - EZT Training Manual”.

Further, I have read and understand the booklet material which constitutes completion of the mandatory Integrated Accessibility Standards Regulation/ Ontario Human Rights Code training as required under the Accessibility for Ontarians with Disabilities Act, 2005 (The Act). Also, any questions I have about this matter have been addressed by the trainer and/or my Manager/Supervisor.

Please register my compliance with the Act.