



London  
CANADA

## Integrated Accessibility Standards Procedure

**Procedure Name:** Integrated Accessibility Standards Procedure

**Revision History:** N/A

**Last Review Date:** August 2, 2019

**Service Area Lead:** Manager, Human Resources and Corporate Services

### 1. Procedure Statement

- 1.1. The *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) is a Provincial Act with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises.
- 1.2. Under the AODA, Ontario Regulation 191/11 entitled “Integrated Accessibility Standards” came into force on July 1, 2011. This regulation establishes accessibility standards specific to information and communications, employment, transportation, the design of public spaces and customer service standards for public and private sector organizations that provide goods, services or facilities to the public or other third parties.

### 2. Definitions

- 2.1. **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.
- 2.2. **Assistive Device:** A device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Customer Service Standard.
- 2.3. **City:** The Corporation of the City of London, excluding boards and commissions.
- 2.4. **Communications:** The interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.
- 2.5. **Communication Supports:** Communication supports are alternative ways of communicating with people with disabilities. Examples of a communication support may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language through an interpreter and other supports that facilitate effective communications.
- 2.6. **Disability**
  - a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
  - b) a condition of mental impairment or a developmental disability,

- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
  - d) a mental disorder, or
  - e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.
- 2.7. **Guide Dog:** A guide dog as defined in section 1 of the *Blind Persons' Rights Act* is a dog trained as a guide for a blind person and having qualifications prescribed by the regulations under the *Blind Persons' Rights Act*.
- 2.8. **Kiosk:** An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.
- 2.9. **Mobility Aid:** A device used to facilitate the transport, in a seated posture, of a person with a disability.
- 2.10. **Service Animal:** Any animal used by a person with a disability for reasons relating to the disability where it is readily identified that the animal is used by the person for reasons relating to their disability as a result of visual indicators such as the vest or harness worn by the animal or where the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to their 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
- 2.11. **Support Person:** A person 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. Examples of a support person may include, but are not limited to, sign language interpreters, interveners, a guide for a person with vision loss, and personal care assistants.
- 2.12. **Taxicab:** A motor vehicle as defined in the *Highway Traffic Act*, other than a carpool vehicle, having a seating capacity of not more than six persons, exclusive of the driver, hired for one specific trip for the transportation exclusively of one person or group of persons, one fare or charge only being collected or made for the trip and that is licensed as a taxicab by a municipality.
- 2.13. **Web Content Accessibility Guidelines (WCAG):** World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0."

### 3. Applicability

- 3.1. This procedure has been drafted in accordance with the Regulation and addresses how the City of London achieves accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that will be followed to meet the accessibility needs of persons with disabilities in the provision of goods, services and facilities.

- 3.2. This procedure applies to all employees, volunteers, Council Members, persons who participate in developing the organization's policies and all other persons who provide goods, services or facilities on behalf of the organization. The Corporation will not tolerate workplace violence of its employees in any of its workplaces, by anyone, including: other employees of the Corporation, non-employees, clients and customers of the Corporation. Accordingly, this procedure applies to all Corporation employees, members of council, volunteers (including Members of Advisory Committees, Special Committees and Task Forces), students on placements and individuals contracted by the Corporation on a "purchase for service" agreement, clients and customers.

#### **4. The Procedure**

##### 4.1. Statement of Commitment

- a) The Corporation of the City of London is committed to providing quality goods, services, and facilities that are accessible to all persons we serve. We will continue to work with the community and allocate appropriate resources toward the elimination of accessibility barriers in customer service, information and communication, employment, transportation and the design of public spaces and are committed to meeting the requirements of applicable legislation, including the *Accessibility for Ontarians with Disabilities Act* and the *Ontario Human Rights Code*.

##### 4.2. General Provisions

- a) Multi-Year Accessibility Plan and Annual Status Update Reports
- i) In consultation with persons with disabilities and the Accessibility Advisory Committee, the City will establish, implement, maintain and update a Multi-Year Accessibility Plan which outlines the organization's strategy to prevent and remove barriers and meet requirements under the Integrated Accessibility Standards. The Annual Status Update Reports will provide updates on the progress made each year toward achieving the strategy and targets identified in the Multi-Year Plan. The Multi-Year Plan and annual status reports will be posted on the City's website and made available in an accessible format upon request.
- b) Procuring or Acquiring Goods, Services or Facilities
- i) The City shall incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so. In the event it is not practicable to do so, an explanation will be provided upon request.
- ii) The City shall incorporate accessibility features when designing, procuring, or acquiring self-service kiosks.
- c) Training
- The City will ensure that training is provided as required by the Integrated Accessibility Standards. The content of the training will include the requirements of the accessibility standards referred to in Ontario Regulation 191/11 and the *Human Rights Code* as it pertains to persons with disabilities. The training provided shall be appropriate to the duties of those being trained.
- i) Training will be provided as soon as practicable, as well as on an ongoing basis if changes to this procedure occur. The City will keep records of the training, including the date on which training is provided and the number of individuals to who it is provided. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA").

#### 4.3. Information and Communications Standards

- a) The City is committed to meeting the communication needs of persons with disabilities in accordance with the Integrated Accessibility Standards and will notify the public about the availability of accessible formats and communications supports as required.
- b) Upon request, the City will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is no more than the regular cost charged to other persons.
- c) In determining the suitability of an accessible format or communication support, the City will consult with the person making the request.
- d) If the City determines that information or communications are unconvertible, it shall provide the individual 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.
- e) Feedback
  - i) The City has processes in place for receiving and responding to feedback and will ensure that these processes are provided in an accessible manner and with communication supports upon request.
- f) Emergency Information
  - i) Where the City prepares emergency procedures, plans or public safety information and makes the information available to the public, the City shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.
- g) Accessible Website and Web Content
  - i) The City shall make its internet website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) as required by the Integrated Accessibility Standard.

#### 4.4. Employment Standards

- a) The Corporation is committed to fair and accessible employment practices. The *Employment Standards Act* outlines requirements for the accommodation of persons with disabilities during the recruitment process and throughout employment with the City.
- b) Recruitment
  - i) The City shall notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.
  - ii) Specifically, the City shall:
    - Notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used;
    - If a selected applicant requests an accommodation, 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;

- Notify successful applicants of the policies for accommodating employees with disabilities when making offers of employment.
- c) Informing Employees of Supports
- i) The City shall 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 a disability.
  - ii) This information shall be provided to new employees as soon as practicable after they begin their employment and shall be updated for all employees whenever there is a change to the existing policies.
- d) Accessible Formats and Communication Supports for Employees
- i) Upon request by an employee with a disability, the City shall consult with the employee to provide or arrange for the provision of suitable 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.
- e) Workplace Emergency Response Information
- i) The City shall provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation. The City shall provide the information as soon as practicable after becoming aware of the need for accommodation.
  - ii) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the City shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.
  - iii) The City shall review the individualized workplace emergency response information:
    - When the employee moves to a different location in the organization,
    - When overall accommodation needs or plans are reviewed, and
    - When the employer reviews its general emergency response policies.
- f) Documented Individual Accommodation Plans
- i) The City shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process shall include the following elements:
    - 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 City may request an evaluation by an outside medical or other expert, at the City's expense, to assist with determining if accommodation can be achieved and, if so, how to achieve accommodation;
    - The manner in which the employee can request the participation of a representative from their bargaining agent, where represented, or other representative from the workplace where the employee is not represented by a bargaining agent;

- 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;
  - If an individual accommodation plan is denied, the manner in which the reasons for the denial are to be provided to the employee;
  - The means of providing the accommodation plan in a format that takes into account the employee's accessibility needs.
- g) Individual accommodation plans shall:
- i) If requested, include any information regarding accessible formats and communications supports provided; if requested, include individualized workplace emergency response information; and identify any other accommodation that is to be provided.
- h) Return to Work Process
- i) The City shall have in place a documented return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. The process shall outline the steps the City will take to facilitate the return to work of employees absent due to disability and include documented individual accommodation plans.
- i) Performance Management, Career Development and Advancement, Redeployment
- i) The City shall take into account the accessibility needs and/or individual accommodation plans of employees when:
- Using performance management processes;
  - Providing career development and advancement; and
  - Using redeployment.

#### 4.5. Transportation Standards

- a) Bus Stops and Shelters
- i) Where the City develops design criteria for bus stops and shelters, the City shall consult the Accessibility Advisory Committee, the public, and persons with disabilities in the development of accessible design criteria considered in the construction, renovation, or replacement of bus stops and shelters. Where applicable, this will include any steps that will be taken to meet the goal of accessible bus stops and shelters.
- ii) Where the City has entered into arrangements with a person respecting the construction of bus stops and shelters, the City will ensure that the person participates in the consultation process.
- b) Taxicabs
- i) The City shall:
- Consult with the Accessibility Advisory Committee, persons with disabilities and the public to determine the proportion of on-demand accessible taxicabs required in the community;
  - Identify progress made toward meeting the need for on-demand accessible taxicabs including any steps to be taken to meet the need;
  - Ensure that owners and operators of taxicabs are prohibited from charging a higher fare or an additional fee for persons with disabilities

and from charging a fee for storage of mobility aids or mobility assistive devices; and

- Ensure taxicabs have vehicle registration and identification information on the rear bumper of the taxicab, and available in an accessible manner to passengers with disabilities.

#### 4.6. Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

a) The City is committed to designing public spaces that are free from barriers and accessible to all persons we serve. The City will comply with the Design of Public Spaces Standards with respect to public spaces that are newly constructed or redeveloped, including:

- Recreational trails and beach access routes
- Outdoor public use eating areas
- Outdoor play spaces
- Exterior paths or travel
- Accessible parking
- Obtaining services
- Maintenance of accessible elements

b) Maintenance of Accessible Elements Procedure

i) The City will maintain the following procedures for preventative and emergency maintenance of accessible elements in its public spaces:

- Staff will regularly monitor the accessible public spaces elements implemented in their Service Area. Staff will actively monitor feedback submissions or notifications from the public that an accessible element requires maintenance and implement corrective actions, as necessary.
- Staff will report any issue or deficiency impacting the accessible public spaces element(s) in a timely manner within their service area for further review and/or follow up. Potential outcomes may include, the element undergoes a plan for remediation and/or emergency maintenance may take place, depending on the circumstances.
- In accordance with section 4.7. (c) *Notice of Temporary Disruption of Goods, Services, and Facilities* of this document, notice of temporary service disruptions of accessible elements shall be provided to the public.

#### 4.7. Customer Service Standards

a) The Provision of Goods, Services, and Facilities to Persons with Disabilities

i) The City will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- The City's goods, services and facilities are provided in a manner that respects the dignity and independence of persons with disabilities;
- The provision of the City's goods, services and facilities to persons with disabilities are integrated with the provision of goods, services and facilities to others, unless an alternative measure is necessary, whether temporary or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the City's goods, services and facilities;
- Persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from the City's goods, services and facilities.

b) Communication with Persons with Disabilities

- i) When communicating with a person with a disability, the City will do so in a manner that takes into account the person's disability.
  - ii) Upon request, the City will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is no more than the regular cost charged to other persons.
- c) Notice of Temporary Disruptions in Goods, Services, and Facilities
  - i) The City is aware that the operation of its goods, services and facilities is important to the public. However, temporary disruptions in the City's services and facilities may occur due to reasons that may or may not be within the City's control or knowledge.
  - ii) The City will make reasonable effort to provide notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that may be available. The City will make reasonable effort to provide prior notice of planned disruption if possible, recognizing that in some circumstances such as in the situation of unplanned temporary disruption, advance notice will not be possible. In such cases, the City will provide notice as soon as possible.
  - iii) When temporary disruptions occur to the City's services or facilities, the City will provide notice by posting the information in visible places, and/or on the [City's website](#), or by any other method that may be reasonable under the circumstances as soon as reasonably possible.
- d) Assistive Devices and other Measures that Assist with Accessibility
  - i) A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from the City's goods, services and facilities. Exceptions may occur in situations 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.
  - ii) In these situations and others, the City may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from the City's goods, services and facilities, where the City has such other measures available.
  - iii) It should be noted that it is the responsibility of the person with a disability to ensure that their assistive device is operated in a safe and controlled manner at all times.
- e) Service Animals
  - i) Persons with a disability may enter premises owned and operated, or operated, by the City accompanied by a service animal, as defined in section 3 of this procedure, and keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, the City will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from the City's goods, services and facilities.
  - ii) If it is not readily identifiable that the animal is a service animal, the City may ask the person with a disability for documentation from a regulated health professional as outlined in section 3 of this procedure, confirming that the person requires the animal for reasons relating to their disability. The City may also, or instead, ask for a valid

identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

iii) It should be noted that it is the responsibility of the person with a disability to ensure that their service animal is kept in control at all times.

f) Support Persons

i) A person with a disability may enter premises owned and operated, or operated, by the City with a support person and have access to the support person while on the premises.

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

iii) The City may require a person with a disability to be accompanied by a support person while on City premises, but only if, after consulting with the person with a disability and considering the available evidence, the City determines that;

- A support person is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises; and
- There is no other reasonable way to protect the health or safety of the person with disability and the health or safety of others on the premises.

g) Feedback

i) The City of London is committed to providing high quality goods, services and facilities to all members of the public it serves. Feedback from the public regarding the provisions of goods, services, or facilities is welcomed as it may identify areas that require change and encourage continuous service improvements.

ii) Feedback from a member of the public about the delivery of goods, services and facilities to persons with disabilities may be given by telephone, in person, in writing, in electronic format or through other methods. The feedback process shall be made accessible to persons with disabilities by providing, or arranging for the provision of accessible formats and communication supports, upon request.

iii) Information about the feedback process will be readily available to the public and notice of the process will be posted on the [City's website](#) and/or in other appropriate locations.

h) Training

i) The City will ensure that all persons to whom this procedure applies receive training as required the Customer Service Standards under Ontario Regulation 191/11 Integrated Accessibility Standards.

ii) The amount and format of training given will be tailored to suit each person's interactions with the public and their involvement in the development of policies, procedures and practices pertaining to the provision of goods, services and facilities.

iii) The content of the training will include:

- A review of the purposes of the *Accessibility for Ontarians with Disabilities Act (AODA)*;
- The requirements of Ontario Regulation 191/11 Integrated Accessibility Standards which includes Customer Service Standards;
- Instruction on the City's policies, procedures and practices pertaining to the provision of goods, services and facilities to persons with disabilities;
- How to interact and communicate with persons with various types of disabilities;
- What to do if a person with a particular type of disability is having difficulty accessing the City's goods, services or facilities;
- How to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal; and
- Information about the equipment or devices available on the City's premises that may help with the provision of goods, services or facilities to persons with disabilities.

i) Timeline for Training

- i) Training will be provided as soon as practicable upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur to the City's policies, procedures and practices governing the provision of goods, services and facilities to persons with disabilities.

j) Records of Training

- i) The City will keep records of the training, including the date on which training is provided and the number of individuals to whom it is provided. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA").

4.8. Availability and Format of Documents Required by the Customer Service Standard under Ontario Regulation 191/11 Integrated Accessibility Standards

- a) All documents required by the Customer Service Standard under Ontario Regulation 191/11 Integrated Accessibility Standards, including the City's Accessible Customer Service policies, procedures and practices, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to MFIPPA.
- b) When providing a document to a person with a disability, the City will provide the document, or the information contained in the document, in an accessible format or with a communication support, upon request. The City shall consult with the person making the request for a document in determining the suitability of an accessible format or communication support and shall also ensure that the information is provided in a timely manner that takes into account the person's accessibility needs due to their disability and at no additional cost.

4.9. Notice of the Availability of Documents

- a) Notice of the availability of all documents required by the Customer Service Standards will be posted on the City's website, and available upon request through the City Clerk's Office and City's public library branches. Accessible alternative formats of the documents are available, upon request by contacting [accessibility@london.ca](mailto:accessibility@london.ca) or by submitting a [Customer Accommodation Request Form](#).