

# Township of Morley

## Municipal Multi-Year Accessibility Plan Creating a Barrier Free Community 2021-2026

Municipal Multi-Year Accessibility Plan  
ADOPTION AND REVIEW GUIDELINES

Approved by By-Law No. 1507 on July 14<sup>th</sup>, 2021

Date of most recent review: \_\_\_\_\_

Sections Revised: \_\_\_\_\_

Approximate date of next review: January, 2026

Repeals By-law No.: \_\_\_\_\_

## **Introduction:**

The Government of Ontario introduced the Ontarians with Disabilities Act, 2001 (ODA) with the purpose of improving access and opportunities to people with disabilities. The primary focus of this legislation was to identify, remove and prevent barriers so that people with disabilities can engage in full participation. Annual accessibility plans became a requirement under this legislation in order to ensure that policies, programs and services were reviewed to remove barriers and prevent new barriers from being created. The ODA legislation was helpful with the identification and removal of barriers throughout the province. However, the government recognized that Ontario was still not fully accessible. As a result, The Accessibility for Ontarians with Disabilities Act (AODA) was passed in 2005. Its goal is to have an accessible Ontario by 2025. In order to achieve its objective, the AODA will establish accessibility standards in the areas of:

- Customer Service
- Transportation
- Information and Communications
- Employment
- Built Environment

The Customer Service Standard, Regulation 429/07 (CCS) mandates compliance of the public sector and private sector industries in the following areas use and treatment of support persons, service animals, assistive devices, alternative formats of materials, methods of notification of service disruption and collective of feedback, as well as development and deployment of staff training.

In June of 2011, the Ontario Government passed Regulation 191/11 – The Integrated Accessibility Standard (IASR). This regulation sets out a variety of general obligations relating to employment, communications and transportation. The regulation sets out the requirements for each of the three standards as well as general requirements with respect to developing accessibility policies and plans, training employees and volunteers, as well as considering accessibility when purchasing goods or services.

## **BACKGROUND:**

In preparation of the Municipal Accessibility Plan is a requirement for local governments in Ontario under the provisions for the Ontarians with Disabilities (ODA), and the Accessibility for Ontarians with Disabilities Act (AODA), 2005 of the Province of Ontario. Further, Municipalities are required to prepare annual updates to the Municipal Accessibility Plan

identifying barriers and the action taken to remove those barriers. This Plan is formally adopted by Council and presented to the Public. Legislation requires that Municipalities with a population over 10, 000 must establish an Accessibility Advisory Committee. The Township of Morley has a population of less than 10,000 and is not required to establish an Accessibility Committee.

## **OBJECTIVES**

The Objective of this Plan is to:

- Seek to Identify, Prevent and remove barriers to accessibility for persons with disabilities, through developing a standard process and tools to help identify and address accessibility barriers.
- Ensure that all people will have access to accessible goods, services and facilities.
- Allow all people to have access to alternate formats and communication supports for any publically accessible information the Municipality produces.
- Implement and maintain a recruitment process that is free of discrimination and considers accommodations for those in need.
- To identify opportunities to improve accessibility and implement reasonable transportation solutions.

## **ACTIONS AND UNDERTAKINGS**

- Develop policies, procedures and programs
- Incorporate accessibility into project and program planning
- Develop, implement and regularly review training programs
- Consult with the public and organizations/agencies
- Implementation of feedback process
- Review and Update the Accessibility Plan at least every 5 years.

## **DEFINITIONS:**

### **Definition of a Disability**

The Ontarians with Disabilities Act (“ODA”), 2001, Accessibility for Ontarians with Disabilities Act, (“AODA”, 2005 and the Integrated Accessibility Standards Regulation, (“IASR”) use the definition that appears in the Ontario Human Rights Code.

**A disability means:**

(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; or

(b) A condition of mental impairment or a developmental disability; or

(c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language; or

(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; (“handicap”)2.0

Note: For other definitions, please refer to Section 2 of the Ontarians with Disabilities Act, 2001.

**Definition of a Barrier:**

A “barrier” is anything that stops a person with a disability from fully taking part in society because of that disability. Some barriers include:

- physical barriers, for example a step at the entrance of a store;
- architectural barriers, for example no elevators in a building of more than one floor;
- information or communications barriers, for example a publication that is not available in large print;
- attitudinal barriers, for example assuming people with a disability can't perform a certain task when in fact they can;
- technological barriers, such as traffic lights that change too quickly before a person with a disability has time to get through the intersection; and
- barriers created by policies or practices, for instance not offering different ways to complete a test as part of job hiring.

## **CUSTOMER SERVICE**

### **Requirements**

- Review and update policies to ensure high quality of customer service.
- Provide Training for all staff, volunteers, those involved in developing customer service policies and third parties as soon as practicable upon an individual being assigned the applicable duties as well as on an on-going basis as changes occur to the Municipalities Policies, procedures and practices governing the provision of goods or services to persons of disabilities.
- Review customer feedback and take appropriate action.

### **Progress**

An Accessibility Standards Policy was developed and adopted by council on July 14<sup>th</sup>, 2021 with related procedures and practices developed in the following areas and are available on the Municipal Website.

Procurement of Goods, Services, Programs and Facilities  
Training  
Information and Communications  
Employment  
Customer Service  
Transportation  
Built Environment  
Guide Dogs and Service Animals  
Support Persons  
Disruption of Services  
Accessibility Feedback

- All Municipal employees who deal with members of the public, and those involved in the developing, practices and procedures have received annual training for the year 2021 on the Accessibility Standard for Customer Service on the provision of its goods or services to persons with disabilities. Annual Training will continue to be done at the beginning of each year and/or when necessary, including hiring of new employees to commence training prior to beginning employment.

- Third parties acting on behalf of the Township are provided a link via the Township of Morley website: [www.townshipofmorley.ca](http://www.townshipofmorley.ca) for the required training on Accessibility Standard for Customer Service.
- On-going employee, volunteer and third party training of new employees, volunteers and third parties as well as when changes occur to the Township's policies, procedures and practices governing the provision of goods or services to persons of disabilities.
- Third party training requirements to provide proof of training prior to commencement of work.
- Keeping an updated record of the training, including the date to which training is provided and the number of individual's 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 Privacy Act (MFIPPA).

## **INTEGRATED ACCESSIBILITY STANDARDS**

### **Requirements**

- Develop and implement policies, procedures and practices governing how the Township will achieve accessibility through meeting its requirements of the Integrated Accessibility Standard (IAS).
- Provide duty specific training on the IAS and Human Rights Code to all Employees, Volunteers, those involved in developing Integrated Accessibility Standards policies and any third parties.

The Township shall incorporate accessibility criteria and features into procuring or acquiring goods, services or facilities,

### **Progress**

Integrated Accessibility Standards Policy (Appendix A) has been developed and adopted by Council on July 14<sup>th</sup>, 2021 with related procedures and practices developed in the following areas and are available on the Township's website:

- Information and Communication
- Employment
- Transportation; and
- The design of public space

Accessibility criteria and features have been incorporated in the Procurement of Goods and Services By-Law.

## **Continuing Initiatives**

- To provide annual training to all Township Employees and volunteers who deal with members of the public or other third parties on behalf of the Township, and those involved in the developing of the Integrated Accessibility Standards Policies, practices and procedures received training on Integrated Accessibility Standards and Human Rights Code as it pertains to persons with disabilities.
- Training to be provided as soon as practicable upon an individual being assigned the applicable duties.
- Third party training requirements to provide proof of training prior to commencement of work.
- Keeping an updated record of the training, including the date to 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 Privacy Act (MFIPPA).
- Create an annual inspection system to ensure barriers are identified and resolved promptly and existing features are maintained.

## **INFORMATION AND COMMUNICATION REQUIREMENTS**

### **Accessible Formats**

1. Upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities.
  - (a) in a timely manner that takes into account the person's accessibility need due to disability; and
  - (b) at a cost that is no more than the regular cost charged to other persons.
2. Consult with the person making the request in determining the suitability of an accessible format or communication support.
3. Notify the public about the availability of accessible formats and communication supports.
4. Internet and intranet websites and web content will conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA.

## **Progress**

Currently our website is being upgraded to conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA.

A statement has been created on this document and on the Municipality's Website of the provision of accessible formats and communication supports for persons with disabilities.

## **Continued Initiatives**

To create and provide alternative accessible formats and communication supports below:

- Internet content conformity to the WCAG at Level AA is ongoing.
- Reading written information to a person directly
- Large print
- Text transcripts of audio or visual information
- Handwritten notes instead of spoken work
- Information written in plain language

## **EMPLOYMENT REQUIREMENTS**

### **Recruitment and selection**

1. Notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes with disabilities.
2. During the selection and recruitment process, job applicants will be notified that accommodations are available and consultation provided with the applicant regarding the provision of a suitable accommodation.
3. Successful applicants will be notified as soon as practical of the policy or updated policy to accommodate employees with disabilities.
4. Employees will be provided with accessible formats and communication supports for,
  - (a) information that is needed in order to perform the employee's job; and
  - (b) information that is general available to employees in the workplace.

## **Progress**

The statement "The Corporation of the Township of Morley is committed to achieving full accessibility for persons with disabilities and accommodations are available for individuals with disabilities for all parts of the recruitment process" will be incorporated into all job posting and the Municipal Website.

## **Continued Initiatives**

The new employee orientation process will implement the requirements of this regulation.

Incorporate appropriate interview questions during the interview process.

## **WORKPLACE EMERGENCY RESPONSE INFORMATION**

Workplace emergency response information will be provided and a designated assistant will be assigned with the consent of the employee who receives individualized workplace emergency response.

Information will be provided as soon as practicable after the need for accommodation has been requested.

A review of the individualized workplace emergency response information will be made;

- (a) when the employee moves to a different location in the organization;
- (b) when the employee's accommodation needs or plans are reviewed and a change is evident; and the general response policies are reviewed.

## **Progress**

An individual Accommodation Plan will be assessed by filling out an "employee Emergency Response Plan Information Worksheet" Appendix B.

## **Continued Initiatives**

Ongoing Review

## **Individual Accommodation Plan**

There are 8 elements in this process

1. Manner in which employee requesting accommodation can participate in the development of plan.

2. Means by which employee assessed on an individual basis.
3. Manner in which employer can request evaluation by outside medicals or other experts, at its expense, to assist in determining if accommodation can be achieved and, if so, how
4. Manner in which employee can request participation of representative from bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in development of the plan.
5. Steps taken to protect the privacy of an employee's personal information.
6. Frequency with which the plan will be reviewed and updated and the manner in which it will be done.
7. If plan is denied, the manner in which reasons for denial is provided to the employee.
8. Means of providing the plan in a format that takes into account the employee's accessibility needs due to disability.

Plans shall include, as required:

- Information on Accessible format
- Workplace emergency response information
- Other accommodation

## **Progress**

The process to document an Individual Accommodation Plan has been put into place for employees in need of accommodation due to disabilities.

An Independent Medical Assessment may be required for the purposes of assisting in providing an Individualized Accommodations Plan and to determine how the plan may be achieved. This request would be at no cost to the employee.

## **Continued Initiatives**

Monitor, Review and update the plan

## **Return to Work Process**

1. Develop and document a return to work process for employees absent from work due to a disability and require an accommodation in order to return to work. The process will:
2. Outline the steps take to facilitate the return to work and use documented individual accommodation plans.

## **Progress**

A written return to work process is in place for employees absent due to disability who require disability related accommodation for returning to work. Included in the process is the possible request for an Independent Medical Assessment and a functional abilities form to assess any accommodations needed in the process.

## **Continued Initiatives**

Monitor, Review and Update the Plan

The accessibility needs and individual accommodation plans of employees with disabilities will be taken into account when using:

- Performance Management
- Career Development and Advancement
- Redeployment